

Don Bachman  
PO Box 7363  
Bozeman, Montana 59771

May 21, 2002

Planning Office, GTNP  
PO Box 352  
Moose, WY 83012

RE: Winter Use Draft SEIS

Dear Comment Reviewer:

Please carefully consider these comments when selecting the Winter Use Plan alternative. Note that I have previously participated in this process through scoping (7/28/98) and DEIS comments (11/11/99). I support SEIS Alternative 1a.

The examination of winter use patterns, impacts and benefits has been exhaustive (no pun intended) and productive. The snowmobile industry has been forced by their own excesses to now look to the production of cleaner and quieter machines. This trend will benefit any area where snowmobiles are used. Hopefully the EPA will promulgate rules to ensure compliance with clean air and noise standards.

The National Park Service has obligations and authority to control use of oversnow vehicles, especially regarding management of wildlife. I am particularly taken with the discussion on pg. 119 which states: "Service-wide regulations prohibit snowmobile use that 'disturbs wildlife' (36CFR 2.18). Therefore, NPS does not have the authority to allow snowmobile use where disturbance occurs."

Once the decision to ban snowmobile use from YNP and GTNP is made, the monitoring program must be initiated and adaptive management adjustments made where warranted. Appendix E. shows how monitoring standards will be applied. I hope that NPS will insure that funding for these monitoring programs through a continuing line item appropriation.

I continue to urge that adaptive management focus on the appropriateness of avalanche control activities on Sylvan Pass. I am pleased to see that OSHA did an assessment of the avalanche control program, which resulted in greater safety considerations for control personnel. Still, there remains the matter of bombardment by 105mm howitzer explosives, of National Park lands so that this corridor can be accessed. I urge that this program be monitored, and that Sylvan Pass (east entrance) be considered for total closure to motorized use.

Other elements of monitoring should consider the slower speed of snow coaches. Longer duration trips call into question continuing operations over the long stretch of road from Canyon to West Thumb, and the East Entrance. Grooming savings would be considerable (\$100,246/season - 11/11/99 comments) in addition to groomer replacement costs. The Fishing Bridge fuel station could also be closed.

Again, I support Alternative 1a.

Sincerely,

Don Bachman

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Barenti

207 W. 23rd Ave.  
Spokane, WA 99203

March 26, 2002

National Park Service  
Winter Use Draft EIS  
Grand Teton and Yellowstone national parks  
PO Box 352 Moose, WY

Dear SEIS comment evaluators,

I am writing to comment on the Supplemental Environmental Impact Statement (SEIS) for winter use in Yellowstone and Grand Teton national parks. The SEIS, as presented, has several serious flaws, with the most basic being the omission of a preferred alternative. One of the goals of the National Environmental Policy Act (NEPA) is to allow the public an opportunity to comment on changes in environmental regulations. But by omitting a preferred alternative, the average citizen must spend an inordinate amount of time reviewing, analyzing and commenting on all possible alternatives since it is unclear which alternative the National Park Service (NPS) favors.

The lack of a preferred alternative in this particular SEIS is especially distressing, as the NPS had already reached a Record of Decision (ROD) requiring the phase out of snowmobiles in the two parks, Yellowstone and Grand Teton, and the ROD had appeared in the Federal Register during January of 2001. The Park Service agreed to conduct a new EIS not because of a court order, but to settle a lawsuit by the snowmobile industry. The case was never fully litigated. It now seems obvious that the purpose of this SEIS, by the new (Bush) administration and the new Secretary of Interior, is to allow the use of snowmobiles in Yellowstone and Grand Teton national parks to continue despite the earlier decision. With that in mind, I must assume either alternative 2 or alternative 3 is the preferred alternative.

It is hard to fully analyze the impact either alternative will have on the two parks, as the SEIS gives the public no idea what type of visitor experience the park service is aiming for, and states no goals for desired noise levels, air quality, or wildlife protections. All we are told is that the NPS will conduct a study over the next three years and adjust snowmobile numbers to protect these still undefined qualities. This is unacceptable. The public needs to know specifics (an example, and just an example, would be something like the goal of no discernable man-made sounds one mile into the backcountry) in order to comment effectively.

I do, however, have these comments about the specifics of the two alternatives, and their shortcomings.

The SEIS fails to show how alternative 2 or alternative 3 will address the snowmobile noise pollution issue within the parks in any significant way. There might be some improvement because of fewer snow machines in the parks, but how much of an improvement isn't stated, and, as mentioned earlier a goal for noise levels is not specified in the SEIS. Noise is simply identified as an issue. The new snowmobiles the SEIS calls for are not any quieter than existing machines, this according to the Park Services' own

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figures contained in the SEIS. I have spent time in Yellowstone's backcountry during winter and the sound of snowmobiles was a constant intrusion. It often sounded like a swarm of bees had invaded every corner of the park. During a ski trip near the Canyon area, I could hear snowmobiles when I was more than three miles from any groomed park road. The SEIS needs to specify noise goals and then provide alternatives that will meet those goals.

The SEIS also fails to show that alternatives 2 or 3 will reduce the incidence of wildlife harassment by snowmobilers. Again, this is something identified as a problem, and again, the public is given no clue about its frequency or what the NPS considers an appropriate number of incidents in any give time frame, be it day, month or season.

Alternative 2 calls for additional law enforcement patrols, but does not specify more employees be hired. It is hard to believe more enforcement is possible without increasing the park's winter staff, which of course raises a series of questions such as how many people are needed, where will the people come from, and where will the money to train and pay them come from? The SEIS gives no clues. Alternative 3 suffers from the same flaws, and again there is a similar lack of detail in the plan relating to hiring, training, pay and law enforcement powers for the required guides.

It's common knowledge that the Park Service is already under-funded and that its employees, while dedicated, are over-worked and under-paid. The SEIS, in alternatives 2 and 3, proposes additional law enforcement responsibilities when it is clear the Park Service cannot stop ongoing illegal activities in the park. A newspaper article in the March 15, 2002 Bozeman Chronicle details reports of "thousands" of snowmobilers illegally entering Yellowstone's backcountry. It is clear the snowmobilers know they are violating the law, this seemed to be an ongoing problem throughout the winter, and yet they did it anyway. The SEIS does not even address the impact these illegal activities are having on the parks, much less give a plan for combating them. At the same time, alternatives 2 and 3 would take valuable resources that could be used for backcountry patrols and use them to try to reduce problems along roads in the "front country." Is this the best use of resources? The SEIS must address illegal snowmobile use and examine that within the context of its alternatives.

As for air quality within the parks, one could argue that the air quality goals will simply be the same as state and federal clean air guidelines, which alternatives 2 and 3 appear to meet. But even here, the process seems flawed. Pollution outputs from different engines, even of the same family, can vary greatly depending on a variety of factors including maintenance history and condition of pollution control devices. For this reason, many areas subject cars to regular emissions testing to ensure emissions requirements are met. Will the park service require snowmobile owners submit their sleds for regular testing to ensure they actually meet the 200 g/kW-hr CO and 75g/kW-hr HC standard? If not, why? If so, how will it be done and who will pay for it? The SEIS needs to address these questions.

Given the problems with this SEIS, the only reasonable action that ensures the protection of Yellowstone and Grand Teton national parks is alternative 1, either 1a or 1b.

I believe the questions and issues raised in my letter fall within the scope of the "Winter

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Use SEIS" and must be addressed as part of the NEPA process. I understand this does not mean the NPS is required to take any action based on my comments.

Also, while these comments were critical of the NPS in general and the SEIS in particular, I know that NPS employees are dedicated to protecting the parks and monuments they manage for the public. I also understand that NPS employees are now under tremendous pressure from Interior Secretary Gale Norton and President Bush to reach a decision favorable to special interest groups that do not have the resource's best interests at heart. It is unfortunate that money and political influence can override good science, common sense, and dedicated employees. I wish the NPS employees good luck.

Sincerely,

Michael C. Barenti

DONALD J. BARRY

To NPS:

Please register my strongest objections to the draft SEIS alternatives which would allow a continuation of snowmobiling in Yellowstone and Grand Teton National Parks. You should retain and enforce the ban on these vehicles which was put in place during the last Administration. Park System laws and policies requiring that park resources and values be kept unimpaired cannot be satisfied through vague promises of "cleaner and quieter" technology, nor can the NPS regulatory standard of "zero tolerance" for the harassment of wildlife in implementing Nixon's Executive Order on ORVs be satisfied in any manner short of an all out ban of snowmobiles. Snowmachining in our national parks is not an appropriate way to experience parks in winter. The use of snowcoaches as proposed under the "No Action" Alternative 1(a) is a much better way to go. It's about time that NPS live up to its legal mandates to protect park resources and quit catering to polluting, noisy means of transportation like snowmobiles.

Sincerely yours  
 Dan Barry

Betsy Buffington  
 618 N. Willson  
 Bozeman, MT 59715

May 29, 2002

Winter Use Draft SEIS Comments  
 Grand Teton National Park, Planning Office  
 P.O. Box 352  
 Moose, Wyoming 83012

To Whom It May Concern:

Thank you for the opportunity to comment again on the future of Yellowstone and Grand Teton National Parks. While the issue at hand is a determination of winter use in these parks, it is clear that your decision will set the course for the level of protection our National Park System can expect for generations to come.

I have great faith that your decision will be based on the law, science and public opinion and that at the end of this industry-driven process, you will begin a phase out of snowmobile use from these parks and instead provide cleaner, quieter, less disruptive access through a snowcoach system. I cannot find anything in the DSEIS that provides justification for to disregard or modify your original decision. I urge you to uphold your original decision to phase out snowmobile use. The implementation of Alternative 1A will provide the best available protection for these irreplaceable treasures while ensuring that the public can enjoy the magic of Yellowstone in ways that leave it unimpaired for the enjoyment of future generations.

The data and analysis regarding the impact that snowmobile use has on wildlife, air quality, human health, visitor experience, economics and the intent of our National Park System was thorough and impressive. I deeply appreciate the effort that was taken to ensure that decision to phase snowmobile use out of the Parks was the right one for many different reasons.

One issue of critical interest to me is that of human health and air quality in our national parks. I am one of the 16-plus million people in the U.S. (CDC) who suffer from asthma. Asthma is a disease I would never wish on anyone; I've heard some describe the struggle to breathe as "feeling like a fish struggling to breath out of water", "trying to breathe through a straw that someone is slowly pinching" and "it's like having an elephant sitting on your chest". My experiences have led me to compare it to what I imagine it would be like to drown, slow or fast depending on the severity of the attack.

I can no longer visit Yellowstone in the winter because of my reaction to the snowmobile emissions. Last winter I decided to test my response to the pollutants and took a snowcoach ride into Old Faithful over President's Day Weekend. Ten days before the

trip I went to my doctor and talked about the risks and possible preventative measures. I ended up having to purchase over \$200 worth of medicine (in addition to the \$100 a month I already spend to treat my asthma). In addition to my pile of medication, I also was forced to bring my nebulizer with me in case of an emergency. Nebulizer treatments are standard during hospital treatment for severe attacks, the machine facilitates the inhalation of medication directly into the lungs. A portable nebulizer is bigger, heavier and bulkier than a laptop computer - not an easy thing to pack for a two-night trip into Old Faithful.

Despite the full stock of preventative medicine and the nebulizer kept me from having an attack in the Park, however for two weeks following my trip I had about 50% of my normal lung capacity and little ability to project my voice.

And it is not just those with asthma who suffer from exposure. People suffering from any kind of weakened immune system, pulmonary disorder and heart disease of any kind are at high risk for health problems when exposed to such pollutants. The elderly, the young and women who are pregnant should not be exposed to such an environment.

Is this the kind of future we want for Yellowstone? Is it okay to allow the exhaust from snowmobiles to prevent people like me, my parents, my nieces and nephews, neighbors and friends - 20 millions Americans and counting - from visiting one of the most special places in the world?

I think both Yellowstone and the American people deserve better.

The Environmental Protection Agency comments on this issue present very strong and detailed concerns regarding possible management scenarios that could allow heavy polluting vehicles to continue visiting the parks.

Both Alternatives 2 and 3 propose cleaner machines, with limits as to the number of snowmobiles allowed through each day. However, even cleaner machines could maintain high levels of carbon monoxide (CO) and other pollutants (EPA Comments).

Due to its extremely high concentrations, CO emissions are of special concern; CO levels at Yellowstone's west entrance at times are higher than LA and Denver. CO is one of the deadliest gases released into our environment, accounting for thousands of deaths each year. Lower, non-lethal doses can still cause serious impacts on an individual's health. Binding to hemoglobin to form carboxyhemoglobin, CO prevents oxygen from binding to hemoglobin and circulating in the blood, thereby preventing the body from getting adequate amounts of oxygen. There is strong evidence of adverse health effects at levels lower than current EPA standards. These effects can include headaches, nausea, visual impairment, decreased manual dexterity and learning abilities and fatigue. Healthy persons with carboxyhemoglobin levels of only 5% have decreased exercise performance and patients with ischemic heart disease have decreased time to onset of chest pain with levels as low as 2%. (Goldfrank) Effects are worse at the high altitudes found around

Yellowstone and Grand Teton National Parks, especially for visitors from lower elevations. In a study of three different counties in the U.S. Moolgavkar found that elevated levels of gaseous pollutants (CO, NO<sub>x</sub>, SO<sub>2</sub>) proved to be the most lethal, with CO being the single most deadly contributor. (Moolgavkar)

Particulate matter (PM) degrades air quality and visibility. Made up of various components, PM refers to particles in our air 10µm in diameter or less. These particles have been found to be strongly associated with increases in daily deaths and hospital admissions worldwide. Comparisons between high and low pollution days show an increase in deaths resulting from cardiovascular causes, often with respiratory disease as a contributing cause of death. Other studies have found that increased mortality rates on high pollution days were not limited to cardiovascular and respiratory causes, but encompass a broad spectrum of "natural" deaths. Suspicions implicating PMs as a trigger to chronic lung disease are mounting, and many scientists believe that cardiovascular effects of air pollution are more likely to harm persons with chronic lung disease. (Schwartz)

Recently, studies have shown smaller particles cause more harm, and as a result the EPA adopted new standards in 1997 regulating particles of 2.5µm in diameter or less (PM<sub>2.5</sub>). PM<sub>2.5</sub> has been found to penetrate more deeply into the lungs than larger particles, and include sulfates, nitrates, acids, metals and carbon particles (including polycyclic aromatic hydrocarbons that have been found to give mice reproductive difficulties, increased birth defects and lower body weights, damage to skin, body fluids and ability to fight off disease; some PAHs may be carcinogenic (ATSDR)). Statistically significant associations between PM<sub>2.5</sub> and lower respiratory symptoms and PM<sub>10</sub> and coughing have been found, including asthma aggravation. Decreased lung function and short-term changes in cardiopulmonary health occur up to 7 days after PM exposure. Seaton et al. believe PM might provoke alveolar inflammation, possibly releasing potentially harmful cytokines. They also hypothesize that PM is responsible for increased blood coagulability in addition to autonomic nervous system-activated changes in blood viscosity, heart rate and heart rate variability. Revisions have been proposed to current EPA standards for PM<sub>2.5</sub> because of the strong evidence of serious health effects at levels lower than current EPA standards.

Snowmobile emissions were not analyzed for PM<sub>2.5</sub>, leaving the NPS unable to make an informed decision regarding the impact of snowmobile exhaust (from 2 or 4 stroke engines) on human health. NPS must be able to analyze this information to determine the health impacts associated with its emission alone and the synergistic effect with other toxins found in snowmobile exhaust.

Ground level ozone, another consequence of motor vehicles, has also been found to be highly detrimental to human health. Ozone is highly reactive and directly toxic to lung tissue, with animal studies showing epithelial cell injury along the entire respiratory tract after exposure to ozone. Acute exposure to ozone can decrease lung capacity in children,

asthmatics, persons with chronic obstructive pulmonary disorder (COPD) and healthy volunteers alike, even at ozone levels below EPA regulation. Heavy physical exertion can also aggravate symptoms. Asthmatics have been found to develop more severe airway inflammation than non-asthmatics, making them particularly vulnerable. (Goldfrank) According to the EPA, ozone aggravates asthma by making susceptible individuals more sensitive to allergens and by decreasing lung function. Ozone irritates the respiratory system causing cough, throat irritation, and uncomfortable chest sensations that can become painful even in non-asthmatics. These symptoms can last for hours after ozone exposure. Ozone can damage lung cells the same way sunburns damage skin cells—damaged cells are quickly replaced (like peeling), but repeated exposure can cause permanent damage. Animal studies suggest that ozone reduces the immune system's ability to fight off respiratory tract bacterial infections. Children, people with respiratory problems, adults who exercise outdoors and people who are particularly sensitive to ozone (and do not fall under the other three groups) are considered to be high-risk groups for ozone damage. Frighteningly, ozone damage can occur without noticeable signs and can continue to cause damage after symptoms cease. (EPA)

Ozone has been found to be particularly harmful when NO<sub>2</sub> is also present at high levels. In one study, damage done when both gases were present was more harmful than either toxicant alone, theoretically due to the formation of a nitrogen radical that was more toxic than either gas. (Klaassen, ed.) Alone, NO<sub>2</sub> (one of the NO<sub>x</sub>s) can cause increased airway reactivity. Many NO<sub>x</sub>'s are highly soluble and decompose in mucous membranes, causing, among other symptoms, painfully stinging eyes.

Despite the damage inflicted by the aforementioned criteria pollutants (so called because the EPA has criteria guidelines for them), other components of gasoline are also quite harmful. Formaldehyde, for example, has been found at elevated levels around the west Yellowstone entrance. Formaldehyde, in addition to being a known carcinogen, can cause eye irritation by easily absorbing into any mucous membrane and can induce bronchoconstriction. (Klaassen) Benzene, another known carcinogen and highly toxic chemical, has also been found at highly elevated levels. Addition of MTBE to gas for the purpose of increasing the oxygen content of gasoline has caused headaches, nausea, dizziness, shortness of breath, light-headedness and sinus problems. Though helping gasoline to burn cleaner, MTBE has proven to be highly toxic to animals in addition to being a known animal carcinogen (a lack of understanding of the full mechanism prevents it from becoming a known human carcinogen). (Mshlman) The EPA confirms that when metabolized by the body, MTBE forms tertiary-butyl alcohol (which suppresses the immune system) and formaldehyde.

1,3 butadiene, a gas at room temperature, has been found to be a multiple-organ carcinogen in animals. Women and non-smokers absorb the most butadiene. Butadiene is quickly absorbed by the body and by fat and slowly released after exposure—butadiene is only harmful after metabolized into active epoxides in the human body; butadiene uptake varied from as much as 18 to 74% depending on the test subject. Xylene affects the brain causing headaches, lack of muscle coordination, dizziness,

confusion and changes in one's sense of balance. In high quantities xylene irritates skin, eyes, nose and throat in addition to contributing to breathing difficulty, lung problems, delayed reaction time, memory difficulties, stomach discomfort and changes in the liver and kidneys. Animals studies suggest that high concentrations of xylene may contribute to delayed growth, development and death to unborn and newborn babies. Toluene also affects the brain, leading to tiredness, confusion, weakness drunken-type actions, memory loss, nausea, loss of appetite and hearing loss. Repeated toluene exposure can cause brain damage, vision and hearing problems, loss of muscle control and poor balance. Animal studies show that like xylene, toluene is harmful to unborn animals when their mothers were exposed, causing babies with neurological problems and retarded growth and development.

Though no information has been collected (to my knowledge) regarding the levels of all these chemicals, it is very likely that even with individual levels below EPA guidelines, the combined effects of the pollutants could trigger lung and cardiac problems that are greater than the additive effects. For example, benzene affects bone marrow, decreasing the amount of hemoglobin in the blood stream. Carbon monoxide binds to available hemoglobin, decreasing the amount of oxygen in the blood stream. Others of the previously mentioned pollutants decrease lung capacity, allowing less air to enter the lungs. Combined with high altitudes, the lack of oxygen (combined with the toxic effects of various pollutants) could do more harm than seen if only studying one pollutant at a time.

Additionally, the long-term effects for many of these pollutants is not known. Studies have shown that people exposed to PM regularly have a higher incidence of lung cancer and cardiopulmonary mortality. Many of the other pollutants are suspected of causing permanent damage, though more research must be done to verify these claims.

Most of these pollutants are shown to decrease the lung's ability to fight off disease. During the winter, when cold temperatures may compromise the immune system's ability to heal, these effects can be particularly harmful. Ironically, most of these chemicals cause more damage to individuals who exercise and don't smoke—thereby causing the most harm to individuals who most prize their health.

Though the snowmobile industry might argue that the effects are only seasonal, even short-term exposure is likely enough to contribute to early mortality of persons with asthma, COPD or cardiovascular disease making the seasonal argument a mute point for them and their families. Currently in America over 7 million persons suffer from cardiovascular disease, 16 million from COPD and 14.5 million from asthma. Effects to unborn children are not known, and though there is no conclusive evidence of child retardation in humans, animal studies show damage to the unborn child. Most pregnant women would not be willing to take that risk.

In addition to cardiac and pulmonary damage from snowmobile exhaust, snowmobiles are responsible for contributing to poor road conditions that cause damage to the

muscular and skeletal systems of park rangers and visitors, likely contributing to painful back problems later in life. Snowmobile noise has been reported to cause ringing in rangers' ears hours after exposure; studies have shown that any noise loud enough to require raised voices to communicate causes permanent hearing damage.

Though many problems with exhaust and snowmobile use have been cited in this paper, many more articles pointing to the detrimental effects have been omitted due to time and space constraints. Searches on PubMed will provide hundreds more articles about the hazards of exhaust, noise damage and musco-skeletal problems.

Please look closely at this information, the thoughtful comments of the Environmental Protection Agency, Physicians for Social Responsibility and Women's Voices for the Earth. I think you will find that the health impacts associated with snowmobile use, regardless of two or four stroke machines, are significant. And while we face these pollutants and toxins in our urban lives, our national parks are special places that provide renewal and sustenance for body and soul. Right now, the winter season in Yellowstone and Grand Teton National Parks provide neither.

Thank you for considering these comments!

With great respect and appreciation,

Betsy Buffington

#### Bibliography:

Moolgavkar SH. "Air pollution and daily mortality in three U.S. counties." *Environ Health Perspect.* 2000 Aug;108(8):777-84.

Zanobetti A, Schwartz J, Gold D. "Are there sensitive subgroups for the effects of airborne particles?" *Environ Health Perspect.* 2000 Sep;108(9):841-5.

Pope CA 3rd. "Epidemiology of fine particulate air pollution and human health: biologic mechanisms and who's at risk?" *Environ Health Perspect.* 2000 Aug;108 Suppl 4:713-23. Review.

Mehlman MA. "Methyl-tertiary-butyl-ether (MTBE) misclassified." *Am J Ind Med.* 2001 May;39(5):505-8.

Opickun RE, Freeman NC, Kelly-McNeil K, Fiedler NL, Liou PJ. "Effect of vehicle use and maintenance patterns of a self-described group of sensitive individuals and nonsensitive individuals to methyl tertiary-butyl ether in gasoline." *J Expo Anal Environ Epidemiol.* 2001 Mar-Apr;11(2):79-85.

Agency for Toxic Substances and Disease Registry (Iliers)

Goldfrank, Flomenbaum, Lewis, Weisman, Howland, Hoffman. *Goldfrank's Toxicology Emergencies* Sixth Edition. Appleton & Lange, 1998, USA.

Dart, Richard C, ed. *The 5 minutes Toxicology Consult.* Lippincott Williams and Wilkins, 2000, USA.

Klaassen, Curtis D, ed. *Casarett and Doull's Toxicology: the basic science of poisons.* 6th Edition. McGraw-Hill 2001.

Bluewater Petition  
SEIS Report

05/18/2002 15:24 FAX 3073442023

PLANNING OFFICE



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To: <grie\_winter\_use\_seis@nps  
 CC:  
 Subject: Comments of SEIS for Winter Use Plans - Yellowstone & Grand Teton  
 National Park and Rockefeller Parkway

Winter Use SEIS  
 P O Box 352  
 Moose, Wyoming 83012

Dear Sir/Madam:

My personal preference is to stay with the original decision to **phase out all snowmobile use** in the subject areas. Like most Americans, I want Yellowstone and Grand Teton National Parks to be peaceful places in winter where bison, elk, and other wildlife are not harassed by noisy vehicles and their drivers. Furthermore, the air pollution snowmobiles cause is a big health hazard with NPS rangers who have to be there to let these machines in being among the most affected.

If the decision is made to continue allowing snowmobile use, however, there must be some major restrictions. Alternative 3 is far better than Alternative 2. It would need to be strengthened with the following requirements.

1. Stick with the original phase-out schedule regarding "existing technology" snowmobiles. Get rid of them by the winter of 2003-2004.
2. Make the snowmobile industry prove its statements about quieter and cleaner "new technology" snowmobiles. Set up a valid process to test them on adjacent national forest lands this coming winter and publish test results.
3. Table S-1 indicates Alternative 3 would allow as many as 1,130 "new technology" snowmobiles per day at the start and the number could increase, depending on adaptive management conclusions. Over a three month period, that could total almost 102,000 snowmobiles, which is **50% higher** than the average 66,000 that use Yellowstone today. These starting numbers are **way too high**. They need to be cut back drastically - at least to no more than 25% of those numbers proposed in Table S-1. In cases like this, it is far easier to start out with low numbers and increase them than to start out with high numbers and suffer the political hassles when you have to lower them later.
4. I understand that the permit process has been streamlined by giving at least some season-long permits out in advance so the permittees can go right into the parks without having to stop and get them each time. I think this should be mandatory for all permits, then pollution and noise problems that the park entrances would be minimized.

Submitted by,

May 17, 2002

Winter Use Draft SEIS Comments  
 Grand Teton and Yellowstone National Parks  
 PO Box 352  
 Moose, Wyoming 83012

Personal / Individual Comments on Supplemental Environmental Impact Statement (SEIS) for Grand Teton and Yellowstone National Parks

People of the United States National Park Service:

**PERSONAL SNOWMOBILES DO NOT BELONG IN AMERICA'S NATIONAL PARKS!**

Why not?

1) **RECREATIONAL SNOWMOBILING IS ENTERTAINMENT, NOT LEGAL ACCESS**  
 Personal motor toys are unlike snow coaches, which offer reliable and affordable access for all visitors while preserving the essential grandeur of the Park. And each snow coach eliminates the noise and traffic of five to six individual snowmobiles.

Unlike visitors who leave their conveyances and self-power their recreation, snowmobilers consume inordinate land in petrol-fired leaps and bounds. Suitably, near most snowbound National Parks, large reaches of Public Land are available for unlimited snowmobile play.

2) **PERSONAL SNOWMOBILE USE PRECLUDES TRADITIONAL ENJOYMENT**  
 Winter machine traffic significantly degrades bipedal and other customary access because it overruns tranquility and impairs visitor safety. Noxious fumes shorten breath, and snowmobiles otherwise annihilate tradition when noise and hazards commandeer the landscape from peaceful visitors.

"Cleaner, quieter snowmobiles" are heavy conveyances designed for helmeted operators. When snowmobile operators pay due attention to their driving, they *disconnect* from companions. Personal snowmobile use interdicts human relations because drivers are poorly disposed to divided attentions.

When quiet visitors encounter 600 pound vehicles that do not bear license plates, the family with young-uns is first to yield. Snowmobile traffic disables customary (quiet) modes of nature enjoyment over wide areas.  
 Personal snowmobile use may be fun, but it is not traditional family activity.

GT & YNP Comment, JCE, page 2

### 3) PERSONAL SNOWMOBILE USE IS COSTLY AND DIFFICULT TO CONTROL

The recent explosion of unlawful and destructive off-road snowmobiling in Yellowstone National Park illustrates the unmanageable nature of personal motor toys, and the consequences of inadequate control. Park scenery and resources are run down in moments by renegade snowmobilers.

Insofar as off-road snowmobiling is widely on the rise in the Greater Yellowstone Area - and unlawfully in Yellowstone National Park - I hope that I may specifically inform concerns of this growing problem. To this end, I enclose a summary of my local observations, last season, of off-road snowmobile practice in the Lake Tahoe area. (See *Public Land Visit Report Summary, Snow Season 2000-2001*, enclosed).

### 4) SNOWMOBILE USE DEGRADES VITAL PARK RESOURCES, including Water, Air, Fauna, Flora, and Quiet

#### Water

Automobiles arrive when the snow melts, and pollute the summer air. But snowmobiles set some of their exhaust into remote Park waters directly, via the snowpack. Pollution spread remotely on National Parks by snowmobiles is more concentrated and more durable than automobile pollution. (See enclosed *Summary*).

#### Air

Snowmobile exhaust emissions that do not set in the snow become airborne, often with profound local effects. Visible haze and noxious odor are obvious immediate problems, but long-term human health effects of airborne particles and other snowmobile emissions are insidious.

#### Fauna

Wintering fauna afflicted with noise, pollution, physical hazards and mental stress of haphazard snowmobile traffic suffer a variety of impacts. When a deer 'freezes' in car headlights, I would be mistaken to interpret its motionless stance as relaxation. Likewise, when wild animals do not run at the approach of snowmobiles, it is naive to surmise that 'wildlife don't mind machines.'

#### Flora

Habits of personal snowmobile use can vary locally, and from day to day. I attach recent photos (taken 3/30/02) of ongoing destructive snowmobile activity on Relay Ridge, Nevada, above Lake Tahoe to show that personal snowmobiles can destroy natural resources in moments. (See enclosed *PLV Report* dated 3/30/02).

#### Quiet

The relentless whine of gasoline engines may be the single trapping of civilization that most demeans the winter splendor of National Parks.

GT & YNP Comment, JCE, page 3

### FINALLY

I found your SEIS to be exceedingly thorough and complete - just like your Final EIS. In many respects, your product is frankly educational - can't get better than this. Perhaps manufacturers of personal snowmobiles will finally acknowledge the quality of your evaluation. Or maybe their opinion will still depend on what you decide?

In any case, it is obvious that you all are well aware that National Parks should be managed to forever provide a sense of the natural splendor of North America. It is also apparent that natural splendor is the first casualty when personal motor toys swarm through the snowscape.

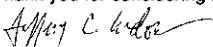
National Parks are dedicated for every one, for ever,  
NOT for seasonal enrichment of local entrepreneurs.  
Income from snowmobile tourism will expand in nearby National Forests;  
but in Parks, seasonal snowmobile profits are poor pretext to sell out America's  
exemplars of natural air, water, sights and sound.

When horse met buggy, the buggy yielded.  
Horses are now rare.  
Man meets his buggy...  
Which will yield?

Recreational snowmobiling has its place,  
**BUT NOT IN NATIONAL PARKS!**  
Please adopt Alternative 1a of the SEIS without delay!

Ban recreational snowmobiling in Grand Teton and Yellowstone National Parks!  
These are the worst of all National Parks to make exception!

Thank you for considering my comments.

  
Jeffrey C. Erdoes  
1015 Jeanell Drive  
Carson City, Nevada 89703

enclosures:  
*Public Land Visit Report Summary, Snow Season 2000-2001 (NV/CA)*  
*Public Land Visit Report dated 3/30/02 (NV)*

Additional data are available, including my 3/7/01 report concerning two-stroke snowmobile exhaust (the 3/7/01 report identifies and evaluates polycyclic aromatic hydrocarbon contaminants in surface snow on Federally protected National Forest). Send information request to: fejistan@earthlink.net



Andy Mahler  
<andy@blueriver.net>  
05/29/2002 06:19 PM  
MST

To: grte\_winter\_use\_seis@nps.gov  
cc:  
Subject: Winter Use SEIS Comments

From: Steven Krichbaum  
412 Carter St.  
Staunton, VA 24401  
May 29, 2002

To: Grand Teton and Yellowstone National Parks  
P.O. Box 352  
Moose, WY 893012  
Email: [grte\\_winter\\_use\\_seis@nps.gov](mailto:grte_winter_use_seis@nps.gov)

Re: Winter Use SEIS Comments

We are writing in response to the National Park Service's request for comments on its Winter Use Supplemental EIS. We do not support any of the alternatives offered in the SEIS. Instead, in order to fully protect the wildlife and ecology of Yellowstone and Grand Teton National Parks and the John D. Rockefeller Memorial Parkway, WE DEMAND THAT THE NPS IMMEDIATELY PROHIBIT SNOWMOBILE AND SNOWCOACH USE OF THE PARKS AND TERMINATE ROAD PACKING/GROOMING ACTIVITIES. ONLY BY PROHIBITING ALL OF THESE ACTIVITIES WILL THE NPS BE IN COMPLIANCE WITH FEDERAL LAWS AND ITS OWN POLICIES AND WILL THE WILDLIFE, PARTICULARLY THE BISON OF YELLOWSTONE NATIONAL PARK, BE FULLY PROTECTED.

In a politically bold and scientifically sound move, the NPS decided in October 2000 to ban snowmobiling in the parks beginning in the winter of 2003-2004 due to the serious, adverse impacts caused by the machines on park wildlife, ecology, air quality and natural quiet. I, along with millions of other Americans, enthusiastically endorsed the snowmobile ban. I and others vehemently disagree with the ban's unwarranted delay and object to the failure by the NPS to analyze the impacts of continued road packing in order to accommodate snowcoach access. In addition to bison, other wildlife use (and are affected by) the packed road system which unnaturally alters wildlife distribution, movements, and predator/prey dynamics in violation of the NPS's natural regulation mandate.

THE NPS HAS VIOLATED FEDERAL LAW BY FAILING TO EVEN CONSIDER A NO-SNOWMOBILING, NO-ROAD PACKING/GROOMING ALTERNATIVE. At the very least, to fully and fairly comply with the NEPA the agency must analyze "Natural Regulation" alternatives.

It is a well-known fact that every activity of the Service is subordinate to the duties imposed upon it to faithfully preserve the parks for posterity in essentially their natural state. Service regulations governing snowmobile recreation also incorporate the preservation mandate. These regulations require that special rules be adopted to permit snowmobiling in national parks in the lower 48 states and specify that snowmobiles can be permitted "only when their use is consistent with the park's natural, cultural, scenic and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources." 36 C.F.R. §2.18(c). Other regulations prohibit activities and uses that disturb living wildlife from its "natural state," 36 C.F.R. §2.1(a)(1)(I), and permit the park's superintendent to close all or a portion of a park area to "all public use if such action is necessary to protect the environment or scenic values of the park [and to] protect natural resources." 36 C.F.R. §1.5(a)(1).

The snowmobile and road policies presently in place are simply not consistent with the Parks' wildlife, values, or objectives. Compliance with these goals requires the establishment of natural regulation as the primary factor controlling wildlife populations and ecological processes in the Parks. This overarching management strategy is necessary in order for the agency to: substantially improve air quality in the parks to the benefit of park ecology, wildlife, and humans who use or reside near the parks; enhance the serenity and solitude of the national park experience; and comply with the law.

While prohibiting snowmobiles will provide benefits to park wildlife, only by also prohibiting road grooming/packing can the NPS maximize the protection of Yellowstone bison and meet its natural regulation mandate. Since bison use the snow-packed roads as energy efficient travel routes, prohibiting road packing will, over time, reduce the number and rate of bison leaving Yellowstone to be shot and slaughtered by the Montana Department of Livestock. At present, bison use of the packed roads facilitates their emigration from Yellowstone where they are brutally and unnecessarily killed by the Montana Department of Livestock. It's time that the NPS stop ignoring the obvious, stop attempting to placate politicians and business people, and start complying with the law by stopping all road grooming/packing activities.

While a prohibition on road grooming/packing may not stop all bison slaughter, it will, over time, reduce the number and rate of bison leaving the protective boundaries of Yellowstone. BANNING SNOWMOBILES, SNOWCOACHES, AND ROAD GROOMING/PACKING IMMEDIATELY WILL ALSO PROVIDE ENORMOUS BENEFITS TO AIR QUALITY, NATURAL QUIET, AND THE ECOLOGICAL INTEGRITY OF THE PARKS. DOING ANYTHING LESS IS UNACCEPTABLE.

In 2002 alone, 200 bison were killed by the Montana Department of Livestock, including 29 bull bison taken to slaughter on May 22. SNOWMOBILES, REGARDLESS OF ANY TECHNOLOGICAL IMPROVEMENTS, SNOWCOACHES, AND ROAD PACKING/GROOMING MUST BE PROHIBITED TO RESTORE THE INTEGRITY OF THE PARKS AND TO FULLY PROTECT PARK WILDLIFE.

The NPS must analyze a "no road packing/grooming" alternative in the SEIS. The NPS is obligated to disclose the serious impacts to wildlife, particularly bison and grizzly bears caused by these practices. Furthermore, if the NPS intends to comply with federal law and its own "natural regulation" policy, it must prohibit road packing/grooming immediately.

UNDER NO CIRCUMSTANCES SHOULD THE NPS REVERSE ITS PROPER DECISION TO BAN SNOWMOBILES IN THE PARKS. HOWEVER, THE PROHIBITION MUST BEGIN IN DECEMBER 2002 AND NOT BE DELAYED ANY LONGER.

Sincerely,  
Steven Krichbaum Andrew Mahler Linda Lee Laura Carlson  
Anthony Blondin Meredith Jabis Erik Viik Tom Moore  
Karyn Moskowitz Robert Hoyt

-----  
Outgoing mail is certified Virus Free.  
Checked by AVG anti-virus system (http://www.grisoft.com ).  
Version: 6.0.351 / Virus Database: 197 Release Date: 4/19/2002

Helen Labun  
Princeton, NJ  
April 30, 2002

National Park Service  
Winter Use SEIS  
P.O. Box 352  
Moose, Wyoming 83012

Comments on 2002 Supplemental Environmental Impact Statement  
Support for Alternative 1a

The National Park Service's Final Environmental Impact Statement (2000) regarding wintertime use of Yellowstone National Park recommended a plan that balanced visitor enjoyment with the need to prevent lasting damage to the natural resources, including wildlife, that YNP protects. The original drafters of the FEIS recognized that the technology of the time constrained their decision<sup>1</sup>. The International Snowmobile Manufacturers' Association (ISMA) claims that snowmobile technology not considered in the FEIS changes the premises of the EIS assessment on which the NPS reached its final recommendations. A careful review of the FEIS, however, will show that the improvements in snowmobile design will not make any significant difference in snowmobilers' negative impact on wildlife. Without changing these impacts, the new technology offers no real solution to the problems being experienced in today's mix of snowmobile use and wildlife habitat. The ISMA-cited changes in available snowmobile equipment should never have occasioned this reopening of the NPS decision in favor of Alternative G as its winter use management plan.

The NPS maintains YNP to meet the demands of both its human visitors and the wildlife there. Alternative G of the FEIS provided for continued visitor enjoyment of the park. This alternative kept extensive networks of groomed and ungroomed trails for

<sup>1</sup> "The selected alternative emphasizes cleaner, quieter access to the parks using technologies available today" (FEIS, Record of Decision).

travel by snowcoach, skiing, and snowshoeing. Educational programs and guided tours of the park, along with visitor facilities such as warming huts and concession stands, further enhanced these recreation opportunities. At the same time, Alternative G minimized negative impacts on park wildlife. Primarily, the plan achieved this through a ban on snowmobiles that would reduce motorized traffic in the park by a factor of 8. These snowmobile restrictions reflect the same degree of caution conveyed in an earlier NPS Executive Order regarding Off-Road Vehicles, that stated "... the widespread use of [offroad] vehicles. . . [is] in frequent conflict with wise land and resources management practices, environmental values, and other types of recreational activity" (EO 11644, FEIS). Motorized access to the park continues in the form of snowcoaches, operated by professionals along predictable paths that allow wildlife to become habituated to their presence. This habituation, though perhaps not ideal, nonetheless reduces energy expenditure from flight and evasion of motorized vehicles and allows wildlife to develop set patterns of movement and forage in concert with vehicle presence.

Some aspects of the winter management plan outlined in Alternative G of the FEIS benefit both visitors and wildlife. For example, studies show that maintaining groomed and lightly trafficked trails may provide ungulates with a cleared trail to feeding areas, thus helping bison and elk lower energy expenditures while also retaining transportation routes for humans. Other aspects of Alternative G require certain compromises. Recreationists accessing the park via non-motorized means may still act aggressively towards wildlife, disrupting their wintertime routines. At the same time, those visitors who once accessed the park via snowmobiles may find their enjoyment diminished by the new restrictions on these vehicles. Respecting the public's right to

access YNP will inevitably impact wildlife there, respecting the needs of wildlife will inevitably impact the public. The NPS has acknowledged that it cannot avoid all conflicts between the park's many users, but it does seek to avoid any impairment ("harm [to] the integrity of park resources or values"- FEIS, Record of Decision). The NPS accomplished this non-impairing balance of different demands in its preferred alternative, G.

In the Draft Supplemental Environmental Impact Statement now before the National Park Service, Alternative G has become Alternative 1a, joined by new plans, 2 and 3. The new plans use the improvements possible from technologies that restrict vehicle noise and emissions as grounds for continuing snowmobile access to the park. Neither alternative 2 nor 3 reduces the area over which vehicle sound is heard<sup>2</sup>, although sound reductions in Alternative 3 do decrease the highest decibel level of motorized sound over ten miles of the most heavily used groomed roads. Emissions standards do not improve overall air quality in the park, except for Alternative 3's reduction of particulate matter from 11 tons released per year to 1 ton<sup>3</sup>. Alternatives 2 and 3 both reduce concentrated air pollution by lowering maximum one-hour pollutant loads at heavily used park regions. One cannot claim that new snowmobile equipment will eliminate sound and emissions problems, but it will have some non-negligible effect.

Certain aspects of the air and soundscape quality in YNP do improve over current conditions under the SEIS alternatives 2 and 3. The FEIS found localized major air pollution effects, where vehicle emissions from staging areas and a few heavily utilized

<sup>2</sup> In Alternative 2 oversnow vehicles can be heard over 50% of the time on 41,260 acres, Alternative 3 lowers this to 24,440 acres, both an order of magnitude above the 2,260 acre audibility achieved in Alternative 1a (SEIS, summary table).

<sup>3</sup> Park-wide emissions for pollutants such as CO and HC (two pollutants targeted by the EPA's proposed snowmobile emissions standards) remain above the Alternative 1a minimum of 479 tons/year and 63 tons/year respectively. Alternative 2 releases 1411 CO tpy, 428 HC tpy, and, unlike the other alternatives,

road segments harmed the health of workers and sometimes impaired visibility (FEIS, Alternative A). Alternatives 2 and 3 reduce these localized effects by reducing maximum pollution concentrations. FEIS analysis of the soundscape reported disruption of quiet and solitude in the park over an extensive acreage in which visitors could hear vehicle noise. The new snowmobile technologies do not reduce the area of noise audibility. Lowered levels of sound intensity might help those employees constantly exposed to vehicular traffic (FEIS, Chapt. IV). Clearly, alternatives 2 and 3 have the advantage of improving the park experience for those visitors who wish to visit on snowmobiles, provided that they can afford the requisite equipment.

The list of those helped by the possible changes in snowmobile equipment does not include wildlife. The original complaints surrounding the sound and emissions, the damages targeted under the SEIS reevaluation, included almost no mention of today's conflicts with wildlife. On noise pollution, the FEIS in Chapter IV states that "... ungulates are especially adaptable to predictable, repeated noise. ... most responses are subtle and short term." In fact, wildlife becomes quickly habituated to traffic noise if it is not accompanied by physical danger. Air quality evaluation in the FEIS used measures based on "... the exposures of employees, visitors, and snowmobile riders and operators to CO and PM worst-case air pollutant levels. ..." (FEIS, pg. 207). High pollution concentrations occur where snowmobiles gather and idle, particularly around entrances to the park (FEIS, Chapt IV, pg. 29). These frequently utilized gathering spots are unlikely to host wildlife for extended periods of time. Human health is the primary concern in

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does not reduce particulate matter. Alternative 3 performs better than 2, leading to a release of 694 CO tpy and 80 HC tpy.

curtailing both snowmobile emissions and vehicular sound. Evaluation of wildlife response to these factors found only mild impacts.

The FEIS does not focus on either sound or air quality issues in its discussion of wildlife impacts. Instead, the document cites concerns with the stresses caused during difficult winter months due to displacement, effective habitat fragmentation, and interruption of normal movements due to human interference. These interferences cause ill health, increased susceptibility to predation, and reduced reproduction by altering movements and costing animals energy through flight. The FEIS assessment of park conditions concluded that "Recreationists. . . because of their numbers and sometimes inappropriate behavior, were causing severe impacts because of harassment and the habituation of particular species" (Chapt. IV, General Effects on Wildlife). The SEIS adds reports from park rangers detailing episodes of snowmobilers passing at unsafe distance to bison, herding ungulates from roadways, and aggravating animals by driving into the center of gathered groups (SEIS, Chapt III).

The "severe impacts" on wildlife reported in both the FEIS and SEIS under current park management stem from direct human-wildlife interactions, which snowmobiles facilitate by increasing visitor access to a greater range of wildlife habitat. The better equipment that the ISMA claims justifies continuing snowmobile use at YNP does not change the nature of these interactions. The NPS called for an EIS so that it could evaluate plans necessary for addressing "existing and potential impacts on resources and values from winter recreational use" (pg. 6), including existing conditions of "harassment and unintended impacts on wildlife from groomed trails and their use. . . ." (FEIS, Chapt. 1). A snowmobile designed to reduce sound and emissions will not lower

"harassment . . . from groomed trails and their use". Both alternatives keep current average peak day loads, except for a moderate cap at the West Yellowstone entrance suggested in Alternative 3. By maintaining high snowmobile traffic levels, both alternatives 2 and 3 of the SEIS maintain the same levels of high (daily) and moderate (weekly) risks of conflict with ungulates now seen along heavy-use road segments and on ungroomed trails throughout the park (Chapt IV, 215-218). Alternative 3 does clump the snowmobiles, a slight improvement over Alternative 2, but not over the baseline set by existing Alternative 1a. The SEIS does not consider impacts to other wildlife because no new information contributes to this area. Therefore, one may assume that snowmobilers will still threaten to disrupt denning bears, interrupt wolf movement patterns in regions off of established snowcoach routes, and add to the fragmentation of lynx habitat<sup>4</sup>.

Harassment of wildlife could decrease, even with a snowmobiler presence, if every visitor to the park, regardless of transportation preferences, behaved with an informed understanding of (and concern for) their actions' impacts on wildlife. One cannot assume perfect behavior, however, and so the park must enforce rules for appropriate conduct. Because the snowmobile opens up far larger territories for all visitors to access than any other non-motorized means of travel, this group poses a particular challenge for law enforcement. Snowmobilers commit 88-percent of traffic violations, a quarter of which involve traveling in prohibited places (SEIS, Chapt 3). On days with poor snow conditions, snowmobilers often leave designated trails in search of better pathways, sometimes creating a problem so large that the park must close temporarily (SEIS, p. 139). Every conflict between wildlife and aggressive recreationists

<sup>4</sup> Alternative G reduces impact on non-ungulate species for much the same reasons that it reduces impact on ungulates (reduction of snowmobile traffic). See Chapt. IV, Alternative G.

reported by rangers surveyed for the SEIS involved a snowmobiler. The snowmobilers who do commit infractions may represent a small part of the entire group, but efforts to reduce snowmobiler conflicts with wildlife already require a large investment of park personnel. Both Alternative 2 and 3 call for increasing this investment while neither alternative can guarantee that law enforcement will be entirely effective.

An implicit cost in Alternatives 2 and 3 is the diversion of NPS resources into snowmobiling programs. The above consideration of law enforcement shows one aspect of these costs, but they extend far beyond additional park patrols. For example, Alternative 3 mandates that an NPS guide accompany snowmobile groups. While some snowmobilers may view this as a desirable addition to their park experience, others may feel burdened by a guide's presence. This forced guiding reduces the number of guides available for non-motorized visitors who wish to make use of the service. Snowmobile equipment standards also require inspections for certified snowmobiles and personnel to monitor compliance. Educational programs instituted under the new alternatives instruct snowmobilers in trail etiquette, but also drain funds and employee work hours for a snowmobile-specific project of questionable efficacy. Proposed carrying capacity studies delay implementation of any necessary snowmobile reductions, even given existing evidence of direct snowmobiler/ wildlife conflicts, and so perpetuate the interim damages, a situation which the drafters of the original FEIS specifically sought to avoid<sup>5</sup>.

If the NPS does not commit valuable resources to accommodating snowmobile access, then it will admittedly lower park enjoyment for snowmobilers. Nonetheless,

<sup>5</sup> "Holding [snowmobile] use at current levels under all alternatives but G would allow documented adverse impacts of snowmobiles to continue. . . reduction of numbers of snowmobiles is problematic because carrying capacity studies are left to the future, and adverse impacts would continue until capacities are determined and effectively implemented. . ." FEIS, Record of Decision, **Natural Resources**.

there is no shortage of other options for enhancing overall visitor enjoyment, each of which would benefit from NPS investment. 76-percent of Yellowstone visitors come to view the scenery and wildlife, an experience that does not require snowmobiles (SEIS, 137). Snowcoaches provide both access to scenic areas and knowledgeable guides who can explain the resources there. Surveys conducted for the original EIS indicate that many summertime only visitors would be attracted to the parks in the wintertime without snowmobiles present, affording an opportunity to introduce an entirely new group to wintertime recreation in Yellowstone. With a decrease in snowmobilers, the parks will see an increase of skiers and snowshoers, who could benefit from more outdoors programs. Resources, both in capital and employee work hours, could go towards broadening the range of programs YNP offers in winter. Snowmobile monies can easily benefit other NPS functions, functions that draw in visitors who may never have experienced the park, build public outreach, and diversify the economic opportunities (retail, guiding, lodging, tours) for local businesses, all without impairing natural resources for future generations.

The compromises between visitor access and wildlife protection that the SEIS introduces with its new management alternatives are no compromises at all. The FEIS already considered the possible trade offs between undisturbed natural resources and visitor enjoyment and reached a balanced position between them. The International Snowmobile Manufacturers Association challenges the FEIS decision by pointing to technological changes. These changes have no bearing on wildlife needs. Reducing snowmobile sound and emissions does nothing to resolve today's wildlife-visitor

conflicts—only elimination of snowmobile traffic will do that. The “adaptive management” programs of Alternatives 2 and 3 are adapted only to maximize snowmobile access. By contrast, Alternative 1a maximizes the quality of *every* component of the Yellowstone National Park system, including the wintertime survival needs of wildlife.

It was never appropriate to reopen the NPS' decision on Alternative G for the purpose of considering new alternatives that ignore the NPS' obligation to natural resource protection. This establishes a highly unsettling precedent for false compromise—the necessary trade-offs between wildlife needs and the interests of human visitors for whom the park must remain accessible already occurred in the original assessment process. The decision should not be between SEIS's alternatives 1, 2, and 3, but between the nine options of the FEIS. Recent snowmobile equipment changes have added nothing substantive to the debate. I urge you not to uphold the original winter management decision by deciding in favor of Alternative 1a of the SEIS.

Sincerely,



S. Helen Labun  
Princeton, New Jersey

21 March 2002

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
PO Box 352  
Moose, Wyoming 83012

Dear decision makers with the Department of the Interior, National Park Service responsible for Yellowstone and Grand Teton national Parks:

I am writing to express my strong support for the Park Service's preferred alternative, Alternative G. I am glad to see the overwhelming public support expressed for reducing or eliminating snowmobiles from these Parks in response to the Notice of Intent to prepare a Supplemental EIS.

I come from a rural background in Minnesota and currently am employed as a Botanist for the state of Minnesota. I am all too familiar with contentious debates between the forces supporting and opposing snowmobile use on public lands in our state, and have been involved in some decisions to close sensitive areas to their use. I am not completely anti-snowmobile as I ride one on occasion. Yet I find the noise intrusive when I am cross-country skiing or snowshoeing in what would otherwise be places filled with only the sounds of wind and wildlife. The air pollution associated with these machines is also disturbing.

I participated in a study while in graduate school that looked at impacts on wildlife along a snowmobile trail in central Minnesota. This study showed that great horned owls on eggs deserted nests near this snowmobile trail and white-tailed deer altered nocturnal movements and yarding behavior near the same trail. The impacts of course increase when unlawful riders leave the trail and venture into restricted areas is too often the case.

In summary, I feel snowmobiles are too intrusive, both to wildlife and to non-snowmobile-riding outdoor recreationists, to be allowed in any of our National Parks, say nothing about two of the crown jewels such as Yellowstone and Grand Teton. I applaud the Park Service in their effort to eliminate this unnecessary and frankly incompatible use of our most treasured public lands.

Thank you for the opportunity to comment on this issue.

Sincerely,



Michael D. Lee  
1026 Sunset Ridge Road  
St. Cloud, MN 56303

320-203-1058  
michael429@astound.net



"Drusha Mayhue"  
<drusha@operamail.com>

05/30/2002 01:40 PM  
ZE8

To: gte\_winter\_use\_seis@nps.gov  
cc:  
Subject: Winter Use Comments

Drusha L. Mayhue  
PO Box 1372  
Bozeman, MT 59717-1372

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
PO Box 352  
Moose, WY 83012

Wednesday, May 29, 2002

Re: Winter Use Plans Draft Supplemental Environmental Impact Statement  
Dear Park Service,

(Note: I am sending by regular postal mail these comments as well as emailing them. In my mailed comments I am including a copy of an article from a February 1971 issue of Life Magazine. It shows that even thirty years ago, snowmobiles were recognized as a problem to be reckoned with. We cannot continue to put off deciding where snowmobiling is an appropriate activity. Making no decision is not a decision. The American people will demand, sooner or later, that snowmobile use be limited in some way.)

I am writing to submit comments on the Yellowstone and Grand Teton National Parks and John D. Rockefeller Parkway Winter Use Plans Draft Supplemental Environmental Impact Statement.

The earlier process resulting in the record of decision of November 2000 garnered more than 65,000 comments and the scientific data supporting that decision was overwhelming. The current process has cost taxpayers an additional \$2.4 million. The November 2000 Decision of Record was made after thorough research had been done.

I am very suspicious of this process and feel that the current administration is trying to impact the outcome regardless of the will of the people and the breadth of scientific facts and findings. This is not to say that the people in the National Park Service and the Department of the Interior don't do their best to protect our national heritage. I believe that the majority of NPS and DOI employees work hard, under difficult circumstances at best. It is the leadership of the National Park Service and the Department of the Interior that is lacking in vision and scope and who seem to be captured by special interests. I fear this administration will give in to special interests. I simply don't trust this administration to do what is best for our National Parks. The burden is on this administration to demonstrate that they will stand up for what is best for Yellowstone and Grand Teton National Parks rather than a small, but vocal, cadre of special interests who seek only the ends that complement their narrow, personal special goals, goals that are not in keeping with protecting our national parks into perpetuity for our children and grandchildren.

I wish to strongly reaffirm the previous decision, currently in place and documented by the record of decision published in November 2000. Alternative 1a of the SEIS is the best choice for Yellowstone and Grand Teton National Parks and the John D. Rockefeller Parkway.

**Legal Framework**

There are several important laws that establish the mandates of the National Park Service. It is important to adhere to these laws and enforce them. These are:

The Organic Act of 1916 (16 USC 1, 2-4) and the General Authorities Act (16 USC 1a-1 through 1a-8) establish the basic mandate of the National Park Service.

The General Authorities Act, amended by the Redwood Act (March 27, 1976, P.L. 95-250, 92 Stat. 163, 16 USC 1a-1), affirms the basic tenets of the Organic Act and provides additional guidance on National Park system management.

Senate Report No. 95-528 on S. 1976, pg. 7, states that under the Redwood amendment:

"The Secretary of the Interior has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever actions and seek whatever relief as will safeguard the units of the National Park System."

The Clean Air Act weighs in on air quality on federal lands. Yellowstone National Park is a Class I airshed. It must be given special consideration to ensure that it remains so.

It is important that the Park Service adhere to these laws in order to protect the world's first national park.

The most important issue regarding Winter Use in Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Parkway is the use of snowmobiles, their impacts on natural resources and wildlife, the loss of natural quiet, and the pollution to our air, water, and soil caused by their use.

**Noise and Natural Quiet**

When I visit our national parks, I expect natural quiet, opportunities for solitude, and the natural sounds of the outdoors such as wind, trees rustling, and animal sounds. Snowmobiles interfere with this enjoyment.

The majority of Americans do not ride snowmobiles. Many visitors will not visit Yellowstone in the winter because they feel snowmobiles are the only way to visit the Park. This discourages visitation. The quality of our natural resources in our parks is more important to the visitor experience than the mode of transportation. The majority of park visitors value natural sounds and tranquility. Snowmobiles interfere with these values.

**Visitor Use and Access**

Similar transportation alternatives are either in place or soon will be in place in Denali, Grand Canyon, Zion and Yosemite National Parks. The NPS should promote clean, quiet and affordable types of group transportation that protect the natural qualities of the parks. Yellowstone is a natural place to look next for expansion of the alternative transportation program already taking place in the Park Service.

Affordable access is a cornerstone of our national park system. Winter visitation to Yellowstone and Grand Teton National Parks and the John D. Rockefeller Parkway is more costly than summer travel. I personally researched and compared the costs for seeing Yellowstone in the winter by snowmobile vs. snowcoach. Comparing these two types of transportation for access into the park reveals a significant price difference for a family of four.

The total cost for a family of four (two children 12 or under) to snowmobile in Yellowstone National Park for one day costs \$340. The breakdown of price is as follows:

\$218/day	for two double sleds (child rides on back)
\$68	(\$17 each for full suit times 4)
\$24	(\$12/sled for insurance)
\$30	(\$15/sled for entry into the Park, good for one week)
\$340	total for family of 4 for one day

A snowcoach tour for a family of four (two children 12 or under) is \$288 from West Yellowstone to Old Faithful. The breakdown of price is as follows:

\$159	(\$79.50 per adult person)
\$169	(\$84.50 per child)
\$20	(Family pass ? entry into Park, good for one week)
\$288	total for family of 4 for one day

This is a difference of \$52 per family of four. The cost savings for the family becomes even greater if they ride the snowcoach into the Park and use Park lodging for their overnight stay rather than using snowmobiles for entry each day. If snowcoaches were used exclusively within the Park the cost of snowcoaches would decrease further because of savings due to standardization.

Access to the GYA by snowcoach will be more cost effective, affording more people the opportunity to visit the national parks than by snowmobile use.

**Visitor Experience**

Let's be clear about this. A majority of people do NOT visit Yellowstone in the winter because they feel that snowmobiles either dominate their visit or are the only way to see the Park. Snowmobiles simply are not a desirable choice for the majority of Americans who visit our National Parks in pursuit of serenity, nature, solitude, and quiet. Most visitors visit Yellowstone to smell the clean air, hear the sounds of nature, see wildlife, and to get away from the hustle and bustle of cities, smog, and noise. Visitor experience is more associated with the quality of resources and values in the park setting, and less associated with the mode of transport used to access them.

Enjoyment by park visitors of park resources and values is part of the fundamental purpose of our national parks. Many forms of recreation enjoyed by certain segments of the public do not require a national park setting and are more appropriate in other areas, and this goes for snowmobiles.

There are many places OUTSIDE of national parks where snowmobilers can enjoy the outdoors.

**Human Health and Safety**

This past winter, 2001-2002, the largest number of citations ever recorded in one season were written. A total of 338 citations were issued, occurring mostly in the West Yellowstone to Old Faithful corridor. Most of the citations were for speeding, careless driving, racing, driving without a license and off-road travel. And there was an increase in the number of incidents with wildlife. Clearly this is a serious safety problem.

In my opinion, the users of snowmobiles seem to have a proclivity, more than the general population, of disregarding laws, rules, and safety measures.

**Social and Economic Issues**

Yellowstone National Park was not established to be the cash cow of any individual, town, city, or government. Yellowstone and Grand Teton National Parks are part of our collective national heritage. The long-term viability, health, and protection of Yellowstone and Grand Teton National Parks should not be threatened or minimized by those wishing to use the parks for their own

economic gain. In fact, individuals making their home and livelihoods near the Parks have a special responsibility to make sure their actions and economic livelihoods do not negatively impact the park.

#### Conclusion

I urge the National Park Service to adhere to the original decision made regarding snowmobile use in Yellowstone and Grand Teton National Parks per the November 2000 record of decision. That decision was right the first time. It's still right this time. Put the long-term protection of Yellowstone Park first ahead of special interests.

Yours truly,

Druska L. Mayhew

--

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634 Cinnabar Basin Road  
Gardiner, MT 59030  
May 22, 2002

Planning Office, Grand Teton National Park  
PO Box 352  
Moose, WY 83012

Comment re. Winter Use Draft Supplemental EIS for  
YNP and associated areas.

For the record:

None of the alternatives in either the original or the supplemental EIS address a critical natural resource problem related to winter use of Yellowstone National Park.

My comments focus on the Yellowstone bison, and are derived from my responsibility for ecological research on this species from the early 1960's through most of 1997. Throughout, I was employed by the National Park Service until reassigned to the National Biological Survey/USGS-BRD.

An important omission in the bibliography of the supplemental EIS reflects a lack of discussion of a crucial topic relative to the future of bison in Yellowstone National Park. The following report has been omitted, although I hand delivered it (on CD) to the YNP planning office:

Taper, M.L., M. Meagher, and C.L. Jerde, 2000. The phenology of space: spatial aspects of bison density dependence in Yellowstone National Park. Final report from Montana State University to U.S. Geological Survey, USGS-BRD Contract 1445-CA09-95-0073 (subagreement 7). Bozeman, MT

The draft supplemental EIS bibliography contains 2 titles referenced to me (Meagher 1998 and Meagher et al. 1994) that touch quite briefly changes in the Yellowstone bison that appear related to winter use. But the omission of the above reference and discussion seems curious since the subject bibliography references other contract reports (i.e. Bowby and Associates, 2000), one thesis dated 2001, and various unpublished source material including personal communications. Thus, the planners seem to have intended that the bibliography be extensive and as helpful as possible, with both published and unpublished material.

My purpose in noting the omission represents a deep concern for the future of the Yellowstone bison. At issue is the system of roads presently in use for winter access. Certain road sections appear to serve as energy-efficient travel linkages between places bison want to be, thus shifting the relationships of winter energetics for this species. The report by Taper et al. (2000) represents the first computer analysis of the data from my aerial surveys spanning 1970-1997. That report also mentions briefly the possible role of these travel linkages in distribution changes and possible habitat degradation. Three related presentations were given by us at the Ecological Society meetings last August, and a paper was presented and completed for publication at the fall YNP Science Conference in October. Other publications are in progress. Throughout, informal discussions and presentations were available to the park, including reports made to the bison research working group generated by Dr. Peter Gogan.

Further, the EIS references 2 studies of bison use of the roads in winter, comments that the use is minor, and apparently dismisses the importance of such use. Two points are relevant here. Bison use cannot be evaluated realistically without starting in 1980, and conducting a long-term analysis, park-wide. Second, in a very harsh living situation, small shifts in the environmental parameters (in this case, additional human-created, energy-efficient travel linkages) can have consequences that would not occur in less-harsh circumstances.

The topic is quite complex ecologically, and there is no precedent in a large grazing mammal, worldwide. Hence, it has been difficult to understand the changes that I was documenting. However, I deciphered the initial patterns involved about 12 years ago, and have made every extensive efforts to communicate, including numerous memos.

comments in flight reports, and a first draft analysis (dated 1993 and never "cleaned up" because interest seemed minimal).

Regrettably for the bison, there have been no discussions with senior members of the park staff, and without discussion of the complexities, I question the understanding of the choices involved. I make this comment from the perspective of the long-term effort I have made, and, more recently, the efforts made with my MSU-Bozeman colleagues (Dr. Taper, Mr. Jerde) to analyze and understand this population.

Unfortunately, the data do not give a clear cause-and-effect relationship between the travel linkages for bison established by recreational winter use of the park and the changes in bison numbers, distribution, and patterns of land-use that have occurred over the past two decades. Such proof is often difficult with complex ecological issues, when a number of interactive/ additive factors may be involved, and the time spanned by the changes is relatively long. Global warming and the state of the Pacific salmon populations come to mind. Nevertheless, the evidence suggests a crucial role derived from the present pattern of winter use by people. The analyses continue, and the weight of evidence builds.

The changes shown by the data analyses bear directly on the distribution and numbers of bison, and perhaps even on their presence. The welfare of other species is involved also, because an ecosystem change has occurred, but further elaboration here does not seem useful. If the system of roads presently in use for winter access remains unchanged, the future of the bison is bleak. I cannot say how many bison will persist, nor their distribution. I can be certain that the population will decrease over time, and distributions likely will continue to change also. Although I find it difficult to think that the population could be exterminated entirely, they are at risk.

Given the documentation of distribution changes, the wild bison are disappearing as a wintering population from the Pelican country. Their land use patterns already have become quite fluid geographically, so their numbers decrease throughout the winter. By winter's end in late May, the numbers of mixed group bison (including cows and calves), has been lower the last couple of years than at any time since the near-extirmination. This has happened regardless of below-average winter snowpacks. Finally, the air survey of May 17-18, 2002 located only scattered bulls and very small bull groups, even though the number of animals totaled 44 for the count unit. I verified the absence of cows by talking with Roger Stradley, the exceptionally talented wildlife pilot for the survey, because the observer has only a couple of years experience, while this pilot has decades of doing surveys across the park on several species, including a few of my own surveys.

I conclude that the National Park Service as the responsible agency stands a good chance of completing what the bison poachers were not able to do at the turn of the century in the Pelican country. This locale served as the last stronghold for wild bison in the United States. Yet mixed groups of bison all leave now as winter progresses, in contrast to nucleus breeding groups remaining throughout the winter by using scattered geothermally-influenced sites when necessary.

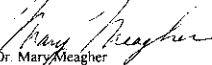
Sadly, this is the first spring in centuries that there have not been over-wintering bison cows with new calves in Pelican Valley. They survived there during the Little Ice Age and the winter of 1996-1997. Based on archeological data, they have done so for some 1000-2000 years. Now they leave to maintain social bonds, rather than doing some scattering as the survival mechanism that allowed this breeding nucleus to remain regardless of conditions.

Changes likely will continue in the rest of the population as well, because bison will move if possible to maintain social bonds. Clearly more move north along the winter roads from the interior, and when they exit the park, numbers will be removed. Human-generated removals outside the park have substituted for natural mortality inside, but over the longer time span, numbers will not again reach the approximately 4000 of 1994. Numbers instead can be expected to continue to decrease, regardless of temporary fluctuations.

A strong case can be made also for attendant habitat degradation. Not only did numbers double by 1994, but the relative distributions changed enormously, and continued data analyses documented significant changes in bison habitat use. There are and likely will continue to be long-term effects on both flora and fauna, including effects on the food sources for grizzly bears and wolves. Further, an ecosystem change inevitably will involve aspects presently unknown.

Finally, the park ceased to maintain my involvement with the bison management EIS topic in May 1995, although I had carried the brucellosis issue for the park for approximately 30 years. Because the changes in the ecosystem focus on bison, the attendant major changes in distribution and numbers have done much to add to the level of conflict outside the park—the reason for the bison EIS. The separation between the two EIS efforts, the lack of communication, and the determination to ignore the long-term bison ecological data seem unfortunate, especially for the bison.

Should service personnel yet wish to pursue discussions, I am open. It seems sad that regardless of decisions, few people have done this (none in what might be termed crucial positions), to be sure they understand this complex topic, and the choices that should have been evaluated.

  
Dr. Mary Meagher  
NPS and USGS animal ecologist (retired)

JOHN C. MULVIHILL  
Attorney at Law

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**COPY**

*April 28, 2002*

*Winters Use Draft SEIS Comments  
Grand Teton & Yellowstone National Parks  
PO Box 352  
Moose, Wyoming 83002*

*Gentlemen & Ladies,*

*I am enclosing herewith a copy  
of my letter of November 23, 1999, dealing  
with the necessity of phasing-out the use of  
snowmobiles in Yellowstone, except on an  
extremely limited basis. My position, and  
that of my family and friends, remains as  
expressed in that letter. The legal basis and  
requirement for the exclusion is clear.*

*The enforcement of a ban is now more  
pressing than in 1999, given the fact that the  
snowmobilers no longer stay on provided  
pathways, causing even greater destruction to  
the park and its animals.*

*again, the Park was created to preserve  
and protect a great natural wilderness, not  
to provide an area for mechanized amusements.*

*Sincerely,*

*John C. Mulvihill, Esq.*

JOHN C. MULVIHILL  
Attorney at Law

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(303) 770-2438  
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November 23, 1999

Mr. Clifford Hawkes  
National Park Service  
Denver Service Center  
12795 West Alameda Parkway  
Lakewood, CO 80228

Dear Mr. Hawkes:

My wife, Carol Peterson, and I appeared at the open meeting held by the Park Service on November 3, 1999. We both made five minute presentations at that time. This letter is intended to supplement the remarks that made at that meeting. My comments are offered after a full reading of "The Winter Use Plan - Draft Environmental Impact Statement, Volumes I and II, July 1999." US Department of Interior and National Park Service.

Our interest is in preserving the serenity and heritage of Yellowstone Park. Many believe that the great numbers of snowmobiles using Yellowstone Park in the winter not only disturb the animals and the environment, but are in the Park in violation of the intent of the original Statute of March 1, 1872 which created Yellowstone Park. "Section 2" of that Act placed the Park under the exclusive control of the Secretary of the Interior who was to make regulations providing for the preservation from injury or spoilage of all - natural curiosities, or wonders within said Park in their natural condition. He was to provide against wanton destruction of the fish and game found within said Park and against their capture or destruction for purposes of profit.

The wonders of the Park certainly include the natural setting for wildlife which cannot be hunted or destroyed by man, a protection unique to the National Park system.

In reviewing the Winter Use Plan and the Draft of Environmental Impact Statement, I note Executive Order 11644 dated February 8, 1972, which deals with regulation and use of off-road vehicles on the public lands. In the first paragraph of the order it is stated that "the widespread use of such vehicles on public lands - often for legitimate purposes but also in frequent conflict with wise land and resource management practices, environmental values, and other types of recreational activity - has demonstrated the need for unified federal policy toward the use of such vehicles on public lands". In Section 1 of the Executive Order it is stated that "it is the purpose of the order to establish policies and provide for procedures that will ensure that the use of off-

Mr. Clifford Hawkes  
November 23, 1999  
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road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various users of those lands".

The Order goes on to state that "areas and trails shall be located to minimize damage to soil, watershed, vegetation, other resources of the public lands and shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Such trails may be used only if the respective agency head has determined that off-road vehicle use in such locations will not adversely affect their natural, aesthetic, or scenic values".

Snowmobiles in great numbers cause enormous and irreversible pollution and noise, interfere with the use of the Park by snowshoers and cross country skiers who are there for a quiet wilderness experience. There should be a drastic limitation on the numbers of snowmobilers and snowmobile machines should not be allowed in the Park at all until the great pollution and noise created by the machines is diminished by appropriate modification of the engines powering such machines.

Executive Order 11989 of May 24, 1977 states that "the respective agency (National Park Service) can determine that the use of off-road vehicles is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands; and immediately close such areas or trails to the type of off-road vehicle causing such effects until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence".

Yellowstone Park is a national treasure of great importance to citizens of all parts of the country. The National Park Service has the responsibility for preserving the natural beauty of this Park and monument. The National Park Service is not responsible for the economic welfare of individuals living in communities that are adjacent to or nearby the Park. In the National Park Service management policies of 1988 (chapter 4, page 17) it is stated that "the National Park Service will strive to preserve the natural quiet and the natural sounds associated with the physical and biological resources of the Parks (for example, the sounds of the wind in the trees, or waves breaking on the shore, the howl of the wolf, or the call of the loon). Activities causing excessive or unnatural sounds in and adjacent to parks, including low-elevation aircraft over-flights, will be monitored, and action will be taken to prevent or minimize unnatural sounds that adversely affect park resources or values or visitors' enjoyment of them". Conclusion 3.1 states that "preserving natural quiet is an integral part of the mission of the National Park Service". This is confirmed in law, policy, and the beliefs of the National Park Service managers.

Page 78 of that document states that "Parks and wilderness offer a variety of unique, pristine sounds not found in most urban or suburban environments. They also offer a complete absence of sounds that are found in such environments. Together, these two conditions provide a very

Mr. Clifford Hawkes  
November 23, 1999  
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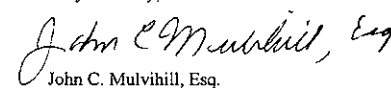
special dimension to a park experience - quiet itself, in the absence of any discernable source (especially man-made), is an important element of the feeling of solitude. Quiet also affords visitors an opportunity to hear faint or very distant sounds (such as animal activity, waterfalls, etc.). Such an experience provides an important perspective on the vastness of the environment in which the visitor is located, often beyond the visual boundaries determined by trees, terrain, and the like. In considering natural quiet of the resource, the ability to hear clearly the delicate and quieter intermittent sounds of nature, the ability to experience interludes of extreme quiet for their own sake, and the opportunity to do so for extended periods of time is what natural quiet is all about".

We have visited the Park in winter both before the advent of snowmobiles and after. The destruction of the quiet and beautiful atmosphere of the winter park by snowmobiles is obvious and frightening. To those of us who enjoy the study and observation of wildlife, it is equally obvious that snowmobile noise and pollution causes great stress and disruption of natural routine to the animal populations within the Park.

Amusement parks and racetracks have been constructed in urban areas to accommodate the use of noisy and speedy vehicles and the thrill of driving or riding in them. Such is not the purpose of Yellowstone National Park. The purpose of the Park is to preserve a natural wilderness. Such vehicles should be prohibited from using the Park, except in an extremely limited fashion, such as for research which will benefit the animal populations.

Please refer to the basic statutes and regulations creating and regulating Park use which clearly point the way to proper management of the Park in winter.

Very sincerely,

  
John C. Mulvihill, Esq.

NAME WITH HELD 1

Subject: Winter Use Comment

Dear Superintendent,

I feel the only way to restore Yellowstone and Grand Teton to a more pristine state would be to remove snowmobiles entirely from the Parks. I feel I have an educated opinion as I have been guiding in Yellowstone for over ten years. I have guided via bus, van, snowcoach and snowmobile. I have also just started a snowcoach business. In my comment I plan to include all of the issues with snowmobiling in the parks and examples of what I have seen over the years. I realize this comment is long, however the snowmobile issue is complicated, and therefore deserves a thorough comment. Please take the time to read each issue below. Please honor science, law and over 12 years of study.

## 1. Pollution

The issue of pollution is a very real issue. I myself have received very nasty sinus infections over the past 6 winters. My health improved greatly this past winter and I attribute my improved health due to A.) moving out of West Yellowstone, so I am not as exposed to the smog as I have been in the past and B.) I'm sure the visitation this past winter is way down from previous years. It is unacceptable to be greeted at the gate with rangers wearing respirators, although I understand the reasoning behind the gas masks, as I too, have spent many months ill. This is not how we should be treating the world's first National Park. I had a day last winter (the Friday before President's Day) and had a lady from Los Angeles on my tour and she called the air in West Yellowstone "absolutely disgusting" (4-5 block visibility). It amazes people when they come to Big Sky and they enjoy the clean air and when they get to West Yellowstone the air is blue and reeks of oil. Remember what attracts the visitors in the first place, a wild, natural, clean air and unspoiled wilderness. It amazes me that most visitors I take in the summer are excited about seeing Yellowstone again and in the winter most people I meet won't come back because of the smell, smog, noise and bumps.

## 2. Road Conditions

One of the Universities, I believe Montana State University, did a study to determine what causes the bumps on the snowpack. The bumps have been determined to be caused by snowmobile acceleration from the vehicle when started at complete stop. This is proven further by the opening of the Freight Road and Virginia Cascades Drive. Both the Freight Road and Virginia Cascades were open to snowcoach use only. Both roadways would stay smooth for days until the next storm or windy day- sure beats grooming the roads twice at night like and a third time during the day on the West Entrance. I must say the midday grooming on the West Entrance road improved conditions greatly, however the road surface would bump out again within ½ to 1 hour after the grooming. Without a second grooming, this did nothing to help the conditions between Madison Junction to Old Faithful. The biggest complaint I hear from my clients (on snowcoaches and snowmobiles) is the rough road conditions. I have had over 40 trips over the last 6 years, which have taken over 2 hours to travel from Madison Junction to West Yellowstone with maybe 2 five-minute stops along the way. It's tough to bang people out of the park

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for two hours and convince them they are still having a good time. Over the years I have given over 10 people rides in the snowcoach when they couldn't handle the rough road conditions on their sleds. The rough road conditions also can lead to accidents, some serious, due to the inexperienced rider the park attracts. Snowmobiling is like skiing, it's better in the Powder. The rough road conditions also lead to illegal off-road riding. The last impression many, if not most, people have of Yellowstone, when traveling through the West Entrance is the conditions of the last 14 miles. Is this really the final impression we want people to have when they leave Yellowstone?

## 3. Noise Pollution

The noise pollution, along with the pollution, could be solved if the snowmobile industry would clean up the machines. The noise is bad, I would say 60-70% of the tours I take, the visitors are unable to hear the Fountain Paint Pots, because of the snowmobile traffic on the trail. I have also hiked to Morning Glory Pool, almost 1½ miles from the Old Faithful Winter Parking lot and you can still hear the machines. Yellowstone sounds like the Indianapolis Speedway, once again something the winter visitors come to get away from is the noise. Yellowstone is so quiet and peaceful in the Northern tier and even the Gallatin with the Semi traffic, compared to the Interior. The new four-stroke sleds are a big improvement, however, they have been proven to be louder than a new Mattrack snowcoach, and still quite pollutant.

## 4. The Idiot Factor

I feel if snowmobiling does remain in the Park, which I hope it doesn't, please do not allow the sledders to ride on their own. Most of the sledders are 1<sup>st</sup> time riders with no experience on a snowmobile. Every year I see close calls, collisions, people run into trees, and even the occasional sled in the river. Fortunately, no one I have seen crash has had any major injuries, although serious injuries and sometimes death occur due to the poor operation of snowmobiles. Another concern I have is the children on the really cold days (25-55 below) riding on the backs of the snowmobiles in the thin ski gear. I have seen countless cases of frostbite and even one young girl with severe hypothermia pass out in the Four Seasons Snack Shop at Old Faithful. Nice way to spend the vacation, eh? Some of the wrecks I have seen include one I just missed. When I left Firehole Falls I came around a corner to find a husband and wife standing in the road with no snowmobile. They flagged me down to tell me their sled had gone into the canyon (luckily they did not go with it). Sure enough the sled had dropped seventy feet into the Firehole River. I went to Madison JCT to call Dennis Young (Law Enforcement for the Madison District) about the incident. I wonder if the fish enjoyed their oil & gas mixture added to the river. One of the many incidents I did witness involved a lady who was passing three snowcoaches, when she lost control, hit the berm and caught 20 feet of air landing with two spectacular splashes in the river. Former tour Guide Dave Bean helped me drag her to shore, strip her down to dry her off, we took her to the Madison Warming Hut. You never forget the sleds that end up in the river. I wonder how many I have missed. I have noticed most years a snowmobiler has run into the back of a snowcoach. I would be willing to bet most accidents are minor and are not reported to the Rangers. I have seen a couple of sleds and I have heard of many more, which have been severely rapped around trees. I have also seen (five times) sleds on the boardwalk at Old Faithful,

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once across the bridge at Biscuit Basin, three tracks through a hot spring or runoff channel, playing in the powder ¼ of a mile into the Freight Road (which is closed to sleds), playing in the powder over ½ mile off the road in the meadows above Washburn Springs overlook, and the list goes on and on and on. Please, if sleds remain in the Park, please, guided only, which will help off-set the few (if any) lay-offs due to the snowmobile ban. Of course there are many more examples I'm leaving out.

#### 5. Wildlife Harassment

This is an almost daily occurrence, at some point during the day I will witness snowmobilers pushing bison down the trail. I will admit most of the time the sledder doesn't realize what he (she) is doing, and does not intend any harm. Guided sled trips will help minimize, if not eradicate this problem. The snowcoach drivers will need to be taught how to pass through bison with minimal impact on the wildlife. Another reason unguided trips should not be allowed is an incident myself and another guide witnessed, was during the winter of 2000-01, when three sledders tried to shoot past approximately 50 snowmobiles and two snowcoaches which were waiting for approximately 30 bison walking down the road. The first two sledders made it, however, the third sledder was forced to slow down as the bison were aggravated and started to run and buck. The third sledder was working his way through the bison when he reached out to slap one of the beasts on the rump. The bison hooked back, with lightning speed, picking up the snowmobile with the rider on it, by the tunnel of the sled, throwing man and machine about 15 total feet into the ditch. I will admit over the years I have only seen 3 occasions, including the previous, where I felt the sledders were purposely harassing wildlife. Unfortunately, there are many occasions when the rider, at a speed dangerous to the animal, is pushing wildlife, unintentionally. Guided trips would alleviate this problem. Many sledders are also careless about food storage, causing a problem with property destruction by Ravens, and "beggar coyotes".

#### 6. Law Enforcement

Why are we spending (and wasting) more tax dollars trying to get a small group of people to behave when they obviously do not want to help their cause, and give the overall snowmobile community a better reputation? Last year, in which the over visitation was obviously down, why did over 10% of the entire visiting population (the majority of the infractions were snowmobiles between the West Entrance & Old Faithful) get warned or ticketed? I'm surprised it wasn't 30 to 40 percent of the visitors. It's kind of ironic the snowmobile industry lobbies for more Law Enforcement at the beginning of the season to try to get the sledders to behave, and at the end of the season the truth comes out that there is an unacceptable number of law being broken by the snowmobilers. It's amazing that the tickets and warnings are way up on a year when the visitation is way down. Every day I see dozens of speeders, at least 3-5 children driving illegally, dozens of sleds parking side-by-side illegally blocking traffic (I have also seen two Alpenguides snowcoach drivers parking side by side blocking the highway). Every year there are hundreds of off-trail tracks, some two to three miles out of bounds. This past winter 2-3 groups admitted they knew and didn't care that they were in an area closed to snowmobiling near the South Plateau. I admit I love to snowmobile and I'm looking at purchasing one, however I am also appalled at the behavior of a good portion

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(not most) of the snowmobiling public. As a snowmobiler, I will not miss riding in the Park too much because it is not a positive snowmobiling experience. There's nothing better than playing in the powder in Henry's Flat (Island Park, ID). Removing sleds from the Park would reduce the current need for most law enforcement currently needed in the wintertime. Guided snowmobiles only would be ok in this category also.

Most avid snowmobilers who come to West Yellowstone might spend one day riding in the Park, however most of their stay will be spent riding outside of the Park. I am all for expanding the trail system outside of the park so the sledders can safely get to more attractions such as Earthquake Lake and MESA Falls. The Park will remain open and the snowmobilers can still take a day off to go into the Park much like the skiers in Jackson and Big Sky do.

#### 7. Loss of Jobs in West Yellowstone and other communities

This is probably the toughest of the issues facing winter use. I own a new snowcoach company in the Park and we hired one full time guide last winter and one part-time mechanic (1 ½ new jobs in our first season and we didn't even know if we would have a permit operate 2 months before the season began). This does not count the two additional jobs created for my partner and I. Next year we are looking at hiring four full time guides, two full time employees to operate a third coach on private lands near Big Sky for a "snowcoach dinner", two full time reservationists, and one ½ time mechanic. This brings a total of 8 ½ new employees for the Yellowstone area next winter. Not bad considering snowmobiling has not been banned or reduced yet. We plan to carry many of these new jobs over to the summer season upon the successful issuance of an Incidental Business Permit or Special Use Permit. I have nothing but praise for Edna Good and her staff in the Business Management Office. She has been the easiest and friendliest of the five different government agencies we had to deal with to become legal. West Yellowstone still is and hopefully (and I'm sure it will) always remain a snowmobile town. I don't see how it could hurt to diversify the offerings, to attract even more people. West Yellowstone, by putting all of their snowmobile eggs in one basket, stands more of a chance of complete collapse if they do not diversify to add more offerings. What ever happened to Ski Yellowstone? A ski area would help the town of West Yellowstone thrive, look at Jackson & Big Sky. My point is, the town is currently only catering hard to the snowmobiling public, which is a very, very small segment of the overall population in this country. If you look at Jackson and Big Sky both use a very small portion of the available land for downhill skiing. This attracts and entertains the majority of the visitors. Both Big Sky and Jackson offer secondary activities such as snowmobiling, snowcoach tours, dog sledding, and cross-country skiing, sleigh rides. Every activity has it's own area which is why you do not have the user conflicts in Jackson and Big Sky that there are in West Yellowstone, where the snowmobiles run everywhere at all hours of the night. West could learn a lot from Big Sky and Jackson, offer more to do in other areas instead of having these loud smelly machines run so rampant you can hear the machines from the cross-country ski area and almost every hotel room. However for every job lost for sled renters and mechanics, the same amount will be gained with more guides & snowcoach mechanics. I firmly believe West Yellowstone will not lose as many reservations as they fear, and people will still come to see the Park, and to snowmobile outside of the Park. Diversification of the town's activities may end up to be on of the

most prosperous things that has happened to West Yellowstone. I strongly encourage to Park to lift the moratorium on summer use so our new companies can hire our guides year 'round. I also applaud the idea to open the Park to rubber tracked snowcoaches in mid-November. This will greatly help the town of West Yellowstone by losing one its two off-seasons. Is it possible to open in the springtime, in addition bicycles, to vans and busses only? It could be open from the West Entrance to Mammoth a week or two after the winter season closes and to Old Faithful pending the de-listing of the Grizzly Bear. This would allow the handicapped and elderly to enjoy the Park in this very quiet season. We could operate on a reduced speed limit basis with all of the restrictions, which were placed two winters ago when the West Entrance was plowed due to lack of snow. Getting to Mammoth in the spring- guided only would also help the town's economy. But because Yellowstone has attracted millions of visitors over the last 130 years, it will continue to do so with or without snowmobiles.

#### 8. Expand winter offerings

It would help to try to expand the winter offerings, to help spread out the coaches even more. When the park closed to over-snow travel due to lack of snow two winters ago, every van and bus in town was full. I ran two trips to Old Faithful on two different days starting earlier and ending later, because visitors were begging us to find a way to take them in. Those were a couple of long days, however, because of it 24 more people were able to go into the Park when all of the companies were sold out. I must also thank the West Gate staff for giving me the combination to the gate (I came out at dark, ½ after they locked the gate). These same folks would not of been able to see everything we normally do on a snowcoach tour, without the extra time, provided by the West Entrance Employees. My point is, it was easy to avoid the other tour groups, and the Park was so quiet and peaceful. The only time we saw any other tour group was at Madison Jct., and at Old Faithful. If Firehole Lake Drive were to open in the winter to rubber tracked snowcoach only, this would further spread people out, and give the guest another major geyser to view, one of the best shows in the Park, and the handicapped and elderly would be able to watch it from inside the coach. Upper terrace drive would be another good option for the handicapped and elderly. Mammoth requires stairs everywhere in the winter. Mammoth is not a busy destination in the winter, and I believe the cross-country skiers and snowcoaches can co-exist as they do on the Freight Road. Another good option is the Natural Bridge. This would be a good snowcoach option because of its remoteness (I haven't been in there since I drove in there in the 80's). The cross-country skiing is also unlimited in the winter time, it would be nice to open some of these roaded areas to allow the motorized public to see more. Inspiration Point, Tower Falls, Lone Star Geyser, Slough Creek, the Blacktail Plateau and Barnes Hole (the road to Riverside- on the West Entrance) should all remain (or become) groomed trails for cross-country skiing and snowshoeing. Expanding the offerings would allow us to expand our (snowcoach operators) offerings.

#### 9. Guided tours

Guided Tours have been well received in other National Parks such as Zion, Yosemite and Grand Canyon and even Yellowstone. Most of our visitors do not know they are in a big volcano, they don't know where to find the wolves or the bears, they don't read the

information and many do not know the water is hot or the animals are dangerous. Guided tours enable the visitor to learn about the place that many geologists refer to as the most geologically interesting place on the Planet. The guest is able to listen to history behind the world's first National Park, which alone makes this Park more unique than any of the others. I have heard people who have gone into the Park on their own go away somewhat disappointed. On the guided tours I see many people who are excited to come back to see more and many wishing they had planned more time for Yellowstone. Currently most people who visit the Park in the summer or winter do so on their own. I would be willing to bet 75% of them will never return. Most of them do not spend a second day. Guided tours will bring them back to see more. I have some clients that have returned 2-5 times. Some of them have noticed how much more I have learned every year, over the years. In the long run, West Yellowstone will see the benefits of guided tours. I would love to see guided trips being pushed harder in the summertime as well. We have been trying to think of ways to keep all of the vans from lying around all summer. Our biggest problem in the summer is not the amount of traffic; it's the type of traffic. I think all of our summer problems would be cured if we banned motor homes unless they have a reservation at a campground. Once in the Park, the motor homes would have to park at their campsite, and either un-hook their car or get on a tour. No more parking across 11 parking spaces with an RV the size of a 47-passenger bus, with a car and boat hooked to the back. This would also create new business such as RV parks, and tour companies at the gateway communities. Which of course will allow the jobs we create in the winter to be carried over to the summer and hopefully year round, if the road is opened from West to Mammoth after the spring plowing.

#### 10. In conclusion

Snowmobiling and winter use have only been around for thirty some years and winter use is in its overall infancy therefore we need to set a precedent to protect Yellowstone, much like our mining forefathers in Virginia City and Helena set when they lobbied to aside the world's first National Park. Pollution, Noise, Wildlife Harassment, habitual law-breakers and constantly rough uncomfortable roads have no place in Yellowstone. I feel my preferable option would be to ban the sleds as soon as possible. The only reason I am not one hundred percent for guided snowmobiles only is because of the road conditions. I have seen life on the other side (the freight road) and it is smooth and comfortable. I am not completely opposed to snowmobile use as long as the trips were guided only (which would help off-set the massive unemployment the town of West Yellowstone thinks will happen). West Yellowstone has the old argument that the town was dried up in the winter before snowmobiling, which is true. What is also true is there was not the transportation infrastructure in the 40's, 50's, 60's or even the 70's or 80's as there is today. The snowmobilers did not ride to West Yellowstone on their sled, they are using the airlines and interstates. West Yellowstone should lobby hard to keep the airport open year 'round and to find some other attractions and activities to keep a diverse country happy with snowmobiling and other winter sports. In addition to being the most convenient entrance to the main attraction in Yellowstone. Option 1A please, with the added snowcoach season in November as soon as possible.

9390

P.O. Box 345  
430 Yellow Rose Road  
Alta, WY 83422  
25 May 2002

Winter Use Plan  
Superintendent's Office  
Grant Teton National Park  
P.O. Drawer 170  
Moose, WY 83012

Dear NPS decision maker:

I write to respond to the Winter Use Draft SEIS regarding the use of snowmobiles in the parks.

In drafting the legislation creating the National Park Service, Congress specifically charged you, the stewards, with the responsibility of conserving the resources "... in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Aldo Leopold wrote of your responsibility to husband the resources, and to educate the recreation visitor to understand and appreciate the unique environmental setting represented by the Park. Olmsted wrote of the importance of preserving scenery "... to engage the contemplative faculty." Leopold, Olmsted, Muir, Abbey, Thoreau – you remember these guys. They were the inspiration for you when you were making your career decisions. Now you're saying "well... certain compromises must be made. We have to take into account those park visitors who want to race through the park, seeking thrills and driving as fast as possible around large mammals as if they were highway cones in a gymkhana." No, you don't. Your legal and ethical mandate requires you to ban the snowmobile and adopt Alternative 1a from the supplemental winter use study.

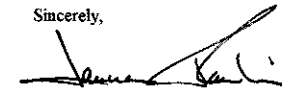
Of course the snowmobile industry will argue the other side. They picture the recreation visitor as an individualist seeking exhilaration, excitement, speed, danger, domination over the elements. *The Snowmobiler's Companion*, cited by Joe Sax in *Mountains Without Handrails*, says "the snowmobile has brought back some of that edge-of-danger excitement, those feelings of man-against-the-elements adventure and man-over-machinery mastery that have been lost in every other form of modern transportation." Fine. I believe that these risk-takers should be able to ride over the roads and trails outside West Yellowstone, outside Cody, in the Palisades, in the Big Holes, and on other public lands where the motorized use will not diminish the National Park resources. Our parks do not have to be all things to all people. They should be managed "within the narrowest limits consistent with the necessary accommodation of visitors," and as stewards, you should make decisions which will disallow activities which are "markedly inharmonious with the scenery or which

would unnecessarily obscure, distort or detract from the dignity of the scenery." (Olmsted, writing about the Yosemite Valley).

I am one individual – a retiree fortunate to live near the parks and a frequent visitor. My expectation is that you career resource managers will do the right thing. I recall that Ed Abbey wrote (in his usual straightforward way) that the recreation visitor would complain at first of physical hardship (after being forced out of his or her vehicle), but after getting out into the park and rediscovering "the pleasures of actually operating their own limbs and senses in a varied, spontaneous, voluntary style" would complain instead of getting back into vehicles. Your job is to move the visitor toward this understanding – not to accommodate every expressed "need" or whim. As a custodian of public resources, you should promote intensive experiences rather than intensive use. The idea of solitude in nature is perhaps the scarcest of all resources today, and you have the ability to preserve a modicum of this marvel.

Please allow us to enjoy our national treasures without the annoying exhaust pollution and dreadful sounds of snowmobiles. Teach us to contemplate and appreciate nature. Those of us who can no longer go deep into the park on cross-country skis can enjoy the snowcoaches. Do the right thing and adopt Alternative 1A.

Sincerely,



Janna S. Rankin

**DASHING THROUGH THE SNOW:  
OREGON AND THE OPEN SLEIGH<sup>1</sup>**

ALLEN REEL<sup>2</sup>

Snowmobiles are a recent addition to our arsenal of modern mechanics. From an insignificant 300 machines sold in 1959, an estimated 600,000 snowmobiles were sold in the United States in 1972 alone.<sup>3</sup> Already there are more than 1,500,000 in use throughout the country.<sup>4</sup> As with many other competitive products, the list of manufacturers is long and continues to grow.<sup>5</sup> Following mushrooming sales, associations of snowmobile owners and operators have been formed,<sup>6</sup> which, along with manufacturers of the machines, sponsor racing events and publicize areas which are open for their use.<sup>7</sup>

Snowmobiles come in a variety of models and styles. The average machine seats two, is 8 feet long, 3 feet wide and weighs 400 pounds. Powered by a two-cycle engine producing anywhere from 12 to 60 horsepower and pushed by a rear track, they glide on dual skis over the snow in almost any terrain. Dealers urge that every member of the family have one. Not only are there full-sized machines for mom and dad, but there are also miniature snowmobiles for kids.<sup>8</sup> And not surprisingly, kids are now available for converting snowmobiles into all-season machines with summer wheels.<sup>9</sup>

<sup>1</sup> B.S. Montana State University (1966), student, Northwestern School of Law of Lewis and Clark College.

<sup>2</sup> This article examines the snowmobile, what it is, its impact on our environment and regulation of it in Oregon.

<sup>3</sup> *Boon or Bane?*, NEWSWEEK, January 24, 1972, at 67.

<sup>4</sup> *Ibid.*

<sup>5</sup> The author counted 16 advertisements in one industry magazine, *INVESTMENT TO SNOWMOBILE*, January-February 1972, Ziff-Davis Publishing Co.

<sup>6</sup> E.g., Western Snowmobile Assoc., Inc., West Yellowstone, Montana.

<sup>7</sup> See, e.g., SNOWMOBILE, INC., THE ASSOC. PUBLICATION, December 1971, Capitol Lithograph and Printing Co., published by three regional and three state associations.

<sup>8</sup> M. Lindberg, *The Kids Are Out!*, SNOWMOBILE, *supra*, note 6, at 9.

<sup>9</sup> J. Hope, *The Invasion of the Kwikl Olys*, *Audubon*, January 1972, at 38.

The snowmobile is not used solely for recreation. Industrial predecessors of the machine, often referred to as snowcats, were and still are used by professionals for snow and water surveys and wildlife management.<sup>10</sup> Since the popular proliferation of snowmobiles, farmers and ranchers have found them extremely helpful for winter feeding, fence mending and related activities.<sup>11</sup> Another innovative use is in rescue operations of persons in distress. But by far the greatest use of snowmobiles is for recreation.

What attracts people to this form of recreation? What is the popular appeal? Social scientists say that people buy snowmobiles to achieve satisfactions that normal, dull jobs cannot provide.<sup>12</sup> Man surrounds himself with power tools and toys to give him feelings of control, masculinity and risk which are no longer available at work in our modern society.<sup>13</sup> But not unlike other mechanical gadgets, the snowmobile takes its toll. Deaths, usually of the driver, are occurring at an increasing rate<sup>14</sup> and it is reported that snowmobilers are more accident prone than hunters.<sup>15</sup> Reported cases actually ligatured are few and far between, but they no doubt will increase geometrically following the phenomenal rise in sales. Cases to date have followed the pattern established by the automobile with similar issues of driver negligence,<sup>16</sup> passenger contributory negligence and assumption of risk<sup>17</sup> and manufacturer strict liability.<sup>18</sup>

The impact on society is not limited solely to operators or passengers however. A survey by the New Hampshire Fish and Game Department reveals that 60% of all rural property owners in that state had experienced either damage or disturbance from snowmobiles.<sup>19</sup> Summer cabins were vandalized, cattle stampeded and

<sup>9</sup> R. Simpson, *Winter's Early Warning System*, SNOWMOBILE, *supra*, note 6, at 14.

<sup>10</sup> S. Winter, *The Case of the Swift, New-angled Yellowstone Tumblerish Century Motor-driven Company*, INVITATION TO SNOWMOBILE, *supra*, note 4, at 94.

<sup>11</sup> *Snowmobile Psychology*, TIME, February 28, 1972, at 51.

<sup>12</sup> *Ibid.*

<sup>13</sup> Anderson, *supra*, note 8; NEWSWEEK, *supra*, note 2.

<sup>14</sup> *Ibid.*

<sup>15</sup> Powell v. Alaska Marine Equip., Inc., 453 P.2d 407 (Alaska, 1969).

<sup>16</sup> Watson v. Zimoli Motor Co., 219 F.2d 96, 280 A.2d 670 (1971).

<sup>17</sup> Reed v. AMF Western Tool, Inc., 431 P.2d 345 (9th Cir. 1970).

<sup>18</sup> NEWSWEEK, *supra*, note 2.

**ALLEN REEL**

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Supreme Court of Oregon  
Clerkship 1974-1975

Municipal Court Judge  
1981-1997

Winter Use Plans  
Grand Teton National Park  
Moose, Wyoming 83002

Re: Snowmobiles in Yellowstone and Grand Teton

Ladies and Gentlemen:

Enclosed is an article regarding the impact of snowmobile use on the environment. The negative consequences have been known for over thirty years. Yet the noise and air pollution continues unabated.

Just for your information, I grew up in Bozeman, Montana and spent many days and nights in Yellowstone. I have close friends who are snowmobilers. And I voted for George Bush! Nevertheless, there is no reason to delay any longer the clear need to limit snowmobile use in Yellowstone and Grand Teton.

Sincerely,

ALLEN REEL

AR: ke  
Enclosure



Even though Professor Wanek's research efforts are continuing,<sup>56</sup> definite conclusions are permissible. Snowmobiles have a significant impact on the winter environment.<sup>57</sup> Without controls, humans will be damaged, animal life disrupted and the land scarred. The machine cannot be ignored and must be reckoned with by state and federal authorities.

Oregon has regulated snowmobiles since 1969.<sup>58</sup> As a part of the Motor Vehicle Code the original statute was concerned primarily with who may operate snowmobiles and whether they could be operated on or across highways.<sup>59</sup> The environmentally significant portion of the statute provided:

No person shall operate a snowmobile in a manner so as to harass, chase or annoy any game animals or birds or domestic animals.<sup>60</sup>

The penalty upon conviction for violating this section was a fine of not more than \$20 for the first offense and not more than \$30 for the second or subsequent offense within a year.<sup>61</sup>

Two bills were introduced in the 1971 regular session of the Oregon Legislature. One was sponsored by Senator Lent,<sup>62</sup> the other by the Committee on Environmental Affairs at the request of the Pacific Northwest Chapter of the Sierra Club.<sup>63</sup> The Sierra Club proposal was addressed not only to snowmobilers but also to all other all-terrain vehicles and had this forceful preamble:

The Legislature hereby declares that the rapid growth in numbers and use of snowmobiles and other all-terrain vehicles and their increasing impact upon other aspects of the public interest are matters of concern to the people of the state. The design, propulsion

56 *Id.* at 8.

57 *Ibid.* Professor Wanek concludes, "The research to date indicates that snowmobiles do have an impact on the physical environment, soil microbes, and the natural and human communities. The research is continuing to protect natural communities and ourselves from ourselves."

58 Ch. 44 § 1-13, Or. Laws 1969, 1345. Motor status originally began to regulate in 1968, 56 Or. Laws 1967, 264; 57 Or. Laws 1969, 264; Ch. 336, Or. Laws 1969, 1061; Ch. 326, Or. Laws 1969.

59 *Ibid.*

60 Ch. 398 § 10, Or. Laws 1969, 1345.

61 Ch. 398 § 12, Or. Laws 1969, 1346.

62 S.B. 286, Or. Legislature (1971).

63 S.B. 550, Or. Legislature (1971).

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*under contract to the commission in the performance of their official duties or to individuals who have received permits from the commission for purposes of research and study.*<sup>75</sup>

The proposal of the Sierra Club would have provided:

No person shall operate an all-terrain vehicle in such a way as to run down or harass deer, elk, or other game animal, or wildlife or any domestic animal, nor shall he carry any loaded weapon, or string bow upon, nor hunt from, nor study or trap using all-terrain or vehicle transportation, except that traps may be used by officers of the State Game Commission or personnel under contract to the commission in their official line of duties, or by individuals who have secured a permit from the commission for purposes of research and study.<sup>76</sup>

The key word is "annoy" which existed in the 1969 statute and was retained in the Lent amendment. The Sierra Club proposal on the other hand did not include this word. The word is significant, as shown by Professor Wanek's study, because even responsible operation of a snowmobile in a safe and sane manner annoys game animals in their winter environment.<sup>79</sup> Thus the amended statute could be the basis on which to absolutely prohibit snowmobile operation in many recreational and forest areas. An unanswered question is whether actual intent to annoy is required by the statute before fines can be imposed on snowmobile operators. Such intent would be difficult if not impossible to establish. The legislature did not preface the prohibition with words of intent and, therefore, it would seem that a showing of intent to do the act which results in annoying animals is enough.

A second environmentally significant clause was added by the Lent amendment:

It shall be unlawful for any person to operate any snowmobile \* \* \* [in any area or in such a manner so as to expose the underlying soil or vegetation, or to injure, damage or destroy trees or growing crops.<sup>78</sup>

As we have seen from the scientific data produced by Professor Wanek, damage can occur to underlying vegetation without actual

73 ORS 483.710(1) (1971) (links added to indicate new matter).

74 S.B. 550 § 19, Or. Legislature (1971).

75 *Supra*, note 50.

76 ORS 483.730(9) (1971).

and capabilities of these vehicles continue to change and become more versatile. Inappropriate and reconsiderate operation of such vehicles is already a matter of public record and concern as are the adverse effects of improper use upon fish and wildlife and their habitat. The use of all-terrain vehicles on public lands which have important values and some values is destructive to and incompatible with such values. The inappropriate use of such vehicles intrudes on the enjoyment of wilderness recreation and on the integrity of private land and property by the owners thereof \* \* \* \*<sup>84</sup>

But the Sierra Club proposal was not reported out of committee.<sup>85</sup> Rather, Senator Lent's bill with extensive modifications<sup>86</sup> was reported out and passed eventually by both houses.<sup>87</sup> It was signed by the governor and became effective on September 30, 1971.<sup>88</sup> It amended and expanded the prior statute<sup>89</sup> whereas the Sierra Club proposal would have repealed it and substituted an entirely new one.<sup>70</sup>

One would expect the Sierra Club proposal to be more environmentally significant than the amendments to the Motor Vehicle Code, but, as will be seen, that may not be the case. Whether or not the legislature so intended, the amendments are environmentally comprehensive and do include important ecological provisions in addition to extensive requirements for registration of snowmobiles<sup>71</sup> and licensing of operators.<sup>72</sup> The previous environmentally significant clause was amended to read:

No person shall operate a snowmobile in a manner so as to run down, harass, chase or annoy any game animals or birds or domestic animals. No person shall hunt from a snowmobile. This subsection does not apply to officers of the State Game Commission, to persons

64 *Id.* at § 1.

65 S.B. 550, Or. Legislature (1971) (tabbed in committee).

66 Senator (now Circuit Court Judge) Lent claims little authorship for the law as passed. Conversation with Berkeley Lent, March 20, 1972. But for purposes of identification, the law will be referred to as the Lent amendment.

67 Ch. 618, Or. Laws 1971, 1155.

68 *Id.* at § 27.

69 Ch. 618, Or. Laws 1971, 1155.

70 S.B. 550 § 26, Or. Legislature (1971).

71 Or. Rev. Stat. § 180.000 (hereinafter cited as ORS 481.770 *et seq.* (1971)).

72 ORS 483.725 (1971).

SPRING 1973 OREGON AND THE OPEN SLEIGH Page 83

exposure or direct contact by a snowmobile.<sup>77</sup> Mere compaction of the snow is sufficient.<sup>78</sup> In this regard the Sierra Club proposal might have had more muscle:

It shall be unlawful for any person to operate any all-terrain vehicle \* \* \* [in any area or in such a manner as to expose the underlying soil or vegetation, or to injure, damage or destroy vegetation or growing crops.<sup>79</sup>

The difference in terminology is not readily apparent. The statute as amended prohibits only exposure of vegetation whereas the Sierra Club proposal would have prohibited any damage to vegetation. As illustrated dramatically by Professor Wanek's study, mere compaction of snow by the machine without exposure of vegetation causes damage.<sup>80</sup> Even though the Sierra Club proposal would have gone further, the amendment as passed does add to the environmental significance of the statute.

As to reducing noise levels of the snowmobile, the amended statute reads:

It shall be unlawful for any person to operate any snowmobile \* \* \* [without an adequate and operating muffling device which shall effectively blend the exhaust and motor noise in such a manner so as to preclude excessive or unusual noise and, on snowmobiles manufactured after January 4, 1973, which shall effectively maintain such noise at a level of 82 decibels or below on the "A" scale at 100 feet under testing procedures established by the Department of State Police; however, snowmobiles used in organized racing events in an area designated for that purpose may use a bypass or cutoff device.<sup>81</sup>

The Sierra Club proposal would have been more strict:

It shall be unlawful for any person to operate any all-terrain vehicle \* \* \* [without an adequate and operating muffling device which shall effectively blend the exhaust and motor noise in such a manner so as to preclude excessive or unusual noise, and, on all-terrain vehicles manufactured after January 1, 1973, shall effectively maintain such noise at a level of 73 decibels or below on the "A" scale at 50 feet

77 *Supra*, notes 36, 37.

78 *Ibid.*

79 S.B. 550 § 15(8), Or. Legislature (1971).

80 *Supra*, note 37.

81 ORS 483.730(6) (1971) (emphasis supplied).

under measurement practices outlined in the "Procedure for Sound Level Measurement of Snowmobiles" used by the International Snowmobile Builders Association (January, 1969), or such other source of standards for measurement of sound levels as the division may adopt, except that all off-highway vehicles used in organized events in an area designated for that purpose may use a by-pass or cutoff device.<sup>82</sup>

Both the statute as amended and the Sierra Club proposal contain other environmentally significant provisions. Both allow treble damages for damage to private property resulting from trespass with a snowmobile.<sup>83</sup> Also, they both allocate portions of the fees collected from registration and licensing of the machines for the development of snowmobile facilities including trails, parking areas and sanitary facilities constructed and maintained for the purpose of accommodating snowmobiles and their operators, although not acquisition of land.<sup>84</sup> The Lunt amendment requires a fine of not more than \$250 or imprisonment for not more than 30 days or both for exposing vegetation or damaging trees or crops.<sup>85</sup> After January 4, 1973, the same penalties will be imposed for violation of the provision relating to noise levels.<sup>87</sup> Running down, harassing, chasing or annoying any game animals, birds or domestic animals or hunting with a snowmobile is a misdemeanor,<sup>88</sup> punishable by a fine of not more than \$1000 or imprisonment of not more than 1 year or both.<sup>89</sup> The Sierra Club proposal would have provided for a fine of from \$25 to \$500 or imprisonment up to 90 days or both for violation of its analogous provisions.<sup>90</sup>

Oregon has other lawful means for regulating snowmobiles apart from the Motor Vehicle Code. Most recreational areas in Oregon are controlled by state or federal agencies which have the power to regulate snowmobile use in their respective jurisdictions. For instance,

<sup>82</sup> S.B. 550 § 15(6). *Or. Legislation* (1971) (emphasis supplied).

<sup>83</sup> ORS 483.991(16) (1971), S.B. 550 § 23(2); *Or. Legislation* (1971).

<sup>84</sup> ORS 481.805(2) (1971); S.B. 550 § 10(3); *Or. Legislation* (1971).

<sup>85</sup> ORS 483.991(14) (1971).

<sup>86</sup> ORS 483.750(6) (1971).

<sup>87</sup> ORS 483.991(14) (1971).

<sup>88</sup> ORS 483.991(15) (1971).

<sup>89</sup> ORS 161.545, 161.553(1), 161.631(1)(a) (1971).

<sup>90</sup> S.B. 550 § 23(1); *Or. Legislation* (1971).

open to snowmobile use can be closed to prevent destruction of plant life and wildlife habitats and to protect the national environment.<sup>102</sup> Motorized vehicles basically are restricted to designated areas, although not necessarily to existing roads.<sup>103</sup> The National Park Service controls 160,895 acres in Oregon, 95% of which is Crater Lake National Park.<sup>104</sup> Its regulations permit snowmobile use only in designated areas on park roads or other overland routes exclusive of foot trails and bicycle paths.<sup>105</sup>

The regulations and policies of these federal agencies seem to be giving consideration to the environmental quality consistent with the National Environmental Policy Act of 1969.<sup>106</sup> A Presidential Order, issued on February 8, 1972, requires further regulations and administrative instructions for designation of areas and trails on all lands under the custody and control of these agencies for off-road motor vehicle use to minimize damage to soil, water shed vegetation or other resources and to minimize harassment of wildlife or disruption of wildlife habitats.<sup>107</sup> Implementation of the Order is to be reviewed by the Council on Environmental Quality.<sup>108</sup> The spirit of the Order is to further restrict areas open to snowmobile use. It also calls for cooperative efforts among the federal agencies as well as between federal agencies and interested state agencies.<sup>109</sup>

Restriction of snowmobile use in these recreational areas to designated trails should eliminate damage to vegetation and trees. The difficult problem will be to enforce such regulations if only be-cause of the vastness of the lands involved. But even if snowmobiles are operated only on designated roads and trails, there is the remaining problem of noise from the machines.

<sup>102</sup> 34 Fed. Reg. 828 (1969).

<sup>103</sup> *Id.* at 860.

<sup>104</sup> Letter from William J. Kennedy, Acting Grant Sup't, Kinman Falls Group, Nat'l Park Service, U.S. Dept. of the Interior, to author, March 27, 1972.

<sup>105</sup> 36 CFR § 2.34 (1971).

<sup>106</sup> 42 U.S.C. § 4321 *et seq.* (Supp. 1970).

<sup>107</sup> Exec. Order No. 11,644, 37 Fed. Reg. 27 (1972).

<sup>108</sup> *Ibid.*

<sup>109</sup> *Ibid.*

the Parks and Recreation Division of the Oregon State Highway Commission administers 83,000 acres in the Oregon Park System.<sup>91</sup> The division has promulgated rules restricting motor vehicles to roads and parking areas constructed or designated for such motor vehicle use.<sup>92</sup> It considers snowmobiles to be motor vehicles and thus subject to these restrictions.<sup>93</sup> The Oregon State Game Commission administers approximately 100,000 acres of land for wildlife and fisheries in the state.<sup>94</sup> The commission is aware of the impact of snowmobiles on Oregon's environment.<sup>95</sup> Because of stress on animals in the winter, it has closed some areas to snowmobile use, but has made no arrests for harassment of wildlife.<sup>96</sup>

By far the greatest percentage of recreational land in Oregon is controlled by the U.S. Forest Service and the U.S. Bureau of Land Management. The Forest Service controls 15,400,000 acres of national forest land in the state.<sup>97</sup> It recognizes the use of snowmobiles as a valid recreational activity but seeks to restrict them by managing, signing, and publicizing snowmobile trails throughout the forest system which follow existing roads.<sup>98</sup> Although consideration is given to wildlife watering grounds when laying out permissible routes, actual snowmobile use is only prohibited in wilderness and primitive areas.<sup>99</sup> The Bureau of Land Management has jurisdiction over 25% of the total acreage in Oregon.<sup>100</sup> This means approximately 15,692,000 acres are under management of the Bureau although not all of the land is open to recreational use.<sup>101</sup> Those areas normally

<sup>91</sup> Letter from Frank D. Sikes, Dir. Snow, Parks and Recreation, Oregon State Hwy. Div., to author, February 23, 1972.

<sup>92</sup> *Final* enclosing State Parks Resolution No. 31 § 3(1), March 30, 1971, on file with the Sec'y of State, Salem, Oregon.

<sup>93</sup> *Supra*, note 91.

<sup>94</sup> *Supra*, note 29.

<sup>95</sup> *Ibid.*

<sup>96</sup> *Ibid.*

<sup>97</sup> Letter from Philip L. Hendon, Asst. Regional Forester, Recreation, Forest Service, Region 6, U.S. Dept. of Agriculture, to author, March 7, 1972, enclosing brochures on snowmobile trails.

<sup>98</sup> *Ibid.*

<sup>99</sup> *Ibid.*

<sup>100</sup> Letter from Edward G. Byrland, Dir., Portland Service Center, BLM, and Daniel F. Burroughs, Chief, Portland Field Office, Nat'l Park Service, U.S. Dept. of the Interior, to author, March 24, 1972, enclosing booklet, *BLM Facts—Oregon and Washington 1970-1971*.

<sup>101</sup> *Id.*, *BLM Facts*, at 3.

The provision of the Motor Vehicle Code which went into effect on January 4, 1973,<sup>110</sup> will reduce current noise to levels which may prevent damage to the operator's hearing. Noise levels will have to be reduced further to insure that such damage does not occur. Other than the Motor Vehicle provision, Oregon has no regulations for controlling snowmobile noise. The Oregon State Department of Environmental Quality has no rules covering noise levels of snowmobiles.<sup>111</sup> The federal agency concerned with noise problems — the U.S. Environmental Protection Agency—had no authority to act,<sup>112</sup> until the passage last autumn of the Noise Control Act of 1972, which gave the EPA the power to formulate noise regulations.<sup>113</sup> Even if noise levels are reduced drastically, snowmobile use will have to be completely prohibited in many areas if disturbance of wildlife is to be avoided.

For environmentalists, the signs are encouraging. Efforts are being made both state and federally to reduce noise levels. The areas open to snowmobile use are being and should continue to be reduced. In areas still open to their use, they are being restricted to existing roads and trails. And snowmobiles are being encouraged to develop permanent tracks on private land. These efforts should be continued until it is certain that snowmobiles are operated only in a manner that will not result in permanent damage to the environment.<sup>114</sup>

<sup>110</sup> ORS 483.750(6) (1971).

<sup>111</sup> Letter from Barbara J. Seymour, Info. Dir., Dept. of Environmental Quality, to author, February 25, 1972.

<sup>112</sup> Letter from Anita J. Franklin, Office of Noise Abatement and Control, Region X, U.S. Environmental Protection Agency, to author, March 16, 1972.

<sup>113</sup> Pub. L. 92-574, § 407(c) (passed Oct. 18, 1972) (1972 U.S. Code Cong. & Ad. News 6585) (requiring Administration to issue noise criteria).

<sup>114</sup> Professor Wayne concludes his *Final Report*, "Some stop-gap measures include more accurate noise level standards. Confining most of the snowmobile use to designated areas, and to designated roads and trails. The state, by promoting responsible recreation rather than reckless abandon in snowmobiling, may also be helped." At 8.

May 21, 2002

Steven F. Iobst  
Assistant Superintendent  
ATTN: Winter SEIS Comments  
Grand Teton National Park  
P.O. Box 170  
Moose, Wyoming 83012

Greetings;

I am the West District Ranger for Yellowstone National Park. I supervise ranger and resource operations for the west half of the park. For the past eleven winters I have supervised winter operations for the most heavily used winter travel corridors in Yellowstone. Please accept the my comments for the SEIS on the Winter Use Plan for Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr., Memorial Parkway:

1. **The concept of moving from single entry recreational snowmobiles to mass transit snowcoaches is a sound and responsible management action that has my full support.**
2. The transition to snowcoaches should be made in an orderly manner during which snowmobiles are phased out as snowcoaches are encouraged. **SEIS Alternative I.A. is the only alternative that resolves the identified impairments in a timely manner.** SEIS Alternative I. B. allows the identified impairments to continue yet another year. This is not acceptable. It exposes park resources, visitors and employees to continued impairment and health risks while at the same time unnecessarily exposing the government to litigation. Additionally, with high snowmobile numbers continuing for the 2000/3 season, several significant problems develop:
  - A. The high numbers of snowmobiles proposed to access the park each day will insure that on most days, the roads will be very mogeled and rough. This makes for a very uncomfortable ride for both snowmobiles and snowcoaches. It also is very hard on any type of mechanized vehicles. **We should be striving to rapidly reduce numbers of snowmobile entries to a level low enough to ensure that our roads are smooth rather than rough.** I suggest that daily entry number is somewhere below 400 entries through the West Entrance.
  - B. There will be no incentive for any business operator to invest in snowcoaches for the 2002/3 season. Actually, there will be quite the opposite. I suspect that many of our visitors during the next several years will be here to take their last shot at snowmobiling in Yellowstone. If significant numbers of coaches are added, it is possible they will sit empty for much of the 2002/3 season. These coaches represent significant investments that we are asking the private sector to make. **To insure a successful transition to snowcoaches, we should provide an orderly descending cap on snowmobile numbers while we allow coach numbers to increase.**

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ENVIRONMENTAL LAW

SPRING 1973

## APPENDIX A

Damage to pine saplings subjected to light, moderate and heavy snowmobile traffic (146 saplings were Red Pine, *Pinus resinosa* and 10 were Jack Pine, *Pinus banksiana*).

TREATMENT	NUMBER OF SAPLINGS			
	No Visible Damage	Some Damage	Heavy Damage	Dead Trees
Control	36	0	0	1
Light Traffic	28	9	3	0
Moderate Traffic	18	14	3	0
Heavy Traffic	17	23	4	0
Total	99	46	10	1

Damage to White Spruce, *Picea glauca* saplings subjected to light, moderate and heavy snowmobile traffic.

TREATMENT	NUMBER OF SAPLINGS			
	No Visible Damage	Some Damage	Heavy Damage	Dead Trees
Control	97	0	0	2
Light Traffic	79	19	7	0
Moderate Traffic	38	33	36	1
Heavy Traffic	20	35	41	0
Total	234	87	84	3

SPRING 1973

SECOND BIENNIAL REPORT

Page 89

## SECOND BIENNIAL REPORT

to the

## FIFTY-SEVENTH

## OREGON LEGISLATIVE ASSEMBLY

from the

## COMMISSION ON JUDICIAL FITNESS

## STATE OF OREGON

January 17, 1973

The protection of "that elusive quality called wise judgment" is the foremost priority in fostering an effective judicial environment. The Oregon Commission on Judicial Fitness was organized to help insure the purity of Oregon's judicial environment. We are publishing the commission's Second Biennial Report with the hope that its wide exposure will assist in achieving the commission's function. In doing so, we have taken the liberty of adding notes, primarily from Commission on Judicial Fitness, First Biennial Report to the FIFTY-SIXTH OREGON LEGISLATIVE ASSEMBLY (1971) and from a 1972 speech given by the commission's executive secretary, Ronald B. Lansing. [The editorial]

## 1. PURPOSE OF COMMISSION:

The Commission investigates charges against judges accused of having engaged in certain misconduct, without failures, national drunkenness or criminal conviction. It shall recommend discipline if it finds the charges true. These grounds are specifically set forth in Article VII, Section 8, of the Oregon Constitution.


Section 8. Removal of judges. (1) In the manner provided by law, and notwithstanding section 1 of this Article, a judge or any

<sup>1</sup> Ronald B. Lansing, Executive Secretary, Oregon Commission on Judicial Fitness, address before Oregon Judicial Conference, Cottage Grove, Oregon, June, 1972, at 18.

3. I still believe that **winter access through the East Entrance makes no sense.** The operation is both administratively expensive and potentially dangerous for both employees and visitors. The East Entrance serves such a low number of daily users that access should be eliminated.
4. **I question the wisdom of relocating the staging point at the South Entrance from Flag Ranch to Coulter Bay.** This will significantly increase the length and cost of a snowcoach ride to either Old Faithful or Canyon.
5. Finally, to off-set the financial impact to gateway communities, and reduce the amount of time Yellowstone is closed to the public, I suggest that **once the conversion to coach only is complete, there is no need to close the Yellowstone between the fall and winter seasons.** We could have a set day where we would close to public access by private vehicle and open to mass transit type vehicles, either wheeled vans and buses if snow cover is lacking, or snowcoach if snow cover is sufficient. All access would be controlled because authorized concessionaires would guide the public around the park. Interior concession facilities would not need to be open. Meals could be provided "box style" by the transit company.
6. There has been much discussion about the development of a new generation of snow coach. While snowcoach technology is not as well developed as we might like, I would point out that it is adequately developed to have moved people around the park for over 30 years. At least two long-standing businesses in West Yellowstone depend exclusively on existing snowcoach technology to transport all of their clients, and have done so for many years. **Existing snowcoach technology is adequate to accommodate the original ROD.**
7. **I strongly oppose any compromise or change in the original Record of Decision that would allow continued long term recreational snowmobile use in Grand Teton or Yellowstone National Parks** with the exception of access to certain properties that have no other reasonable means of access.

Thank you for the opportunity to comment. I am confident that once the conversion is complete, the quality of a winter visit to these three park areas will be of a much higher level than what exists today.

Sincerely,

  
 Bob Seibert  
 P.O. Box 705  
 West Yellowstone, MT 59758



rsolomon@Princeton.E  
 DU (Ruth Solomon)  
 03/28/2002 09:26 PM  
 EST

To: grte\_winter\_use\_seis@nps.gov  
 cc.  
 Subject: comments for winteruse policy

6/6/02

As the National Park Service (NPS) reconsiders its decision to phase out snowmobiles in Yellowstone and Grand Teton National Parks because of new evidence from the snowmobile makers and other interested parties, I recommend that the NPS implement Alternative 1b from the winter use draft SEIS currently under review. This alternative will preserve the long-term goal of the national parks to protect wildlife while allowing affected businesses more time to diversify or refocus their services. My recommendation is based solely on the impact to wildlife—it does not include social or economical considerations that may also affect NPS's ultimate decision. My decision is founded on studies indicating increased stress level in individual animals as a result of interaction with human traffic, and the effect such stress may have on animals already impacted by the winter conditions in the parks.

According to the original FEIS Record of Decision (ROD), the Organic Act (16 USC 1, 2-4) calls for conservation of park resources and values even if there is no risk of impairment. In particular, there is emphasis on preserving, to the highest extent possible, undisturbed wildlife in natural setting.<sup>1</sup> The 1963 Leopold report, which addressed management issues in the national parks system, recommended that "If too many tourists crowd the roadways, then we should ration the tourists rather than expand the roadways... Additionally in this connection, it seems incongruous that there should exist in the national parks mass recreation facilities.... We urge the National Park Service to reverse its policy of permitting these non-conforming uses, and to liquidate them as expeditiously as possible (painful as it may be to concessionaires). Above all other policies, the maintenance of naturalness should prevail."<sup>2</sup>

6/6/02

The NPS's own Management Policies 2001<sup>3</sup> state that park resource and values include the "park's scenery...wildlife...natural landscapes ...[and] natural soundscapes." (Management Policy No. 1.4.6) Visitors' experiences include those that can be sustained "without causing unacceptable impacts to the park's resource and values", yet these experiences should "promote enjoyment through a direct association with, interaction with, or relation to park resources" (Management Policy No. 8.2). In making its decision for the appropriate level of access to visitors, the NPS must determine the optimal level of accessibility to visitors of various physical capabilities while preserving, to the highest degree possible, the park's natural setting and the protection of values for which it was established. Based on anecdotal and scientific evidence, private snowmobile use is detrimental to the park's resources and values, and this negative impact can be minimized, while still providing reasonable visitors' access, with the use of the mass transit snowcoaches.

Although the wildlife populations are not declining as a result of increasing snowmobile use, there are documented cases of increased stress in individual ungulates and wolves that are exposed to snowmobile traffic. Fecal glucocorticoid (FGC), a stress hormone, was found in elevated concentrations in elk near the busiest oversnow road, from West Yellowstone to Old Faithful<sup>4</sup>. In addition, daily variations in FGC in elk varied in tandem with snowmobile volume<sup>5</sup> suggesting causality. Wolf FGC level was also found to be higher in areas of heavy snowmobile use and activity<sup>6</sup>. Ungulates along groomed snow routes were observed to have increased heart rates and elevated energy expenditures by Aune (1981)<sup>7</sup>.

6/6/02

Although snowmobile use at current levels does not appear to be impairing the long-term viability of wildlife in the parks, it is affecting their environment in ways that are harmful to individual animals. It is thus in conflict with the resources and values of the parks which include providing the opportunity to view "undisturbed wildlife in a natural setting."<sup>8</sup> While the use of snowcoaches to provide visitors' access will not eliminate the exposure of wildlife to motorized vehicles, the substantial decrease in the number of vehicles (estimated to be at least eight fold) and the more predictable nature of the snowcoach-wildlife interactions will reduce the stressfulness of the encounters.

There are several aspects of private snowmobile use that render that form of transportation more stressful to wildlife and less manageable, even if cleaner and quieter snowmobiles are developed and adopted. In fact, it appears that certain behaviors by individuals and close encounters with humans are sufficient to adversely impact wildlife. A recent study<sup>9</sup> found that off-trail "clean" activities, such as skiing and snowshoeing induced the highest level of behavioral change (displacement to avoid encounters with humans, e.g.) in elk and bison. This may be the case because off-trail activities are less predictable in terms of their locations and timing, and may therefore be more likely to startle nearby animals. Exacerbating this effect, some individuals riding snowmobiles are either unaware of or choose not to follow behavioral guidelines that are designed to minimize conflicts with wildlife. Park employees recorded several types of harassment of wildlife by snowmobilers, including herding animals down the roadway, preventing animal road crossings, approaching animals to provoke a response, and causing animals to flee. There are also recorded cases of animal mortality or injury as a result of

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collisions with snowmobiles. There were about 64 snowmobile-wildlife collisions between 1995-2000.<sup>10</sup>

Even with an increased level of vigilance by park employees, such behaviors are unlikely to be eliminated. These encounters are stressful and exhausting to the animals affected and can be fatal to wildlife already operating at or near an energy deficit as a result of the scarce winter food supply. These conflicts can also cause injury to snowmobilers if a frightened or startled animal attacks or fails to give ground. Conflicts can be especially dangerous on the Continental Divide Snowmobile Trail (CDST) because it intersects the moose's winter range. The natural instinct of moose is to remain in place rather than flee during an encounter, so they are more vulnerable to vehicular conflicts with either snowmobiles or automobiles on nearby US Highway 89, which runs parallel to the CDST. The use of snowcoaches instead of snowmobiles will significantly reduce the possibility of such conflicts. Snowcoach operators are likely to be better trained and supervised and therefore more likely to follow NPSs behavioral guidelines. The snowcoaches' more predictable operation and stops schedule and the overall reduction in traffic volume is expected to minimize detrimental encounters with wildlife.

Based on the evidence presented by the NPS and other researchers, the winter use policy that is most consistent with the protection of the parks' resources and values is the phasing out of snowmobiles and the use of snowcoaches to maintain a similar level of visitors' access during winter time. Alternative 1b is preferred because it gives commercial snowmobile operators an additional year to adapt to the new regulation and

6/6/02

acquire snowcoaches or redirect their target destinations to nearby national forests if they so choose. A one-year delay is acceptable because the current snowmobile use level does not seem to irreversibly impair the overall wildlife population in the parks.

Alternative 1b will impose limits on snowmobile use based on a nine-year average peak day starting in 2002-2003, and begin to eliminate snowmobile use in 2003 in some areas of GTNP. CDST will be closed starting in 2004, and snowcoaches will replace snowmobiles entirely by the end of 2005. This alternative, when fully implemented, is expected to reduce the risk of conflict on all ten traveled road segments to a low level, meaning such incidents would be completely eliminated or occur infrequently. In contrast, Alternative 2 and 3, which would still allow snowmobile access to YNP and GTNP, will result in daily conflicts on some road segments. If Alternative 2 is implemented, there will still be six high-risk road segments and four medium risk road segments, while if Alternative 3 is adopted it will result in three high risk, four medium risk, and three low risk road segments. The acceptance of Alternative 1b (or 1a, which would ban snowmobiles a year earlier than 1b) is also expected to completely eliminate or greatly reduce the incidence of mortality of large mammals as a result of oversnow vehicular collision.

The decision to phase out snowmobiles from YNP, GTNP, and the Parkway is one that should not be made lightly. Wildlife populations in the parks are not declining, and visitor access to the parks is an important management goal. Nevertheless, the parks were created as havens for wildlife, and their primary purpose is to protect, to the highest

6/6/02

degree possible, the well-being of the animal populations and their supporting habitat.

Based on the FGC studies and other studies indicating negative physiological effects from snowmobile interactions, it is clear that ungulates and other animals that are active during the winter seasons are negatively impacted by interactions with human traffic.

The inability to monitor snowmobilers and the anecdotal evidence of intentional or unintentional harassment of wildlife points to the need to change the mode of transit in

the park. Snowcoaches will not eliminate the conflicts but they offer the advantage of

reduced traffic, more certain compliance with desired wildlife interaction guidelines,

similar accessibility level, and greater predictability. While the need to change the

long-term park policy is clear, there does not seem to be an urgent need to eliminate

snowmobiles immediately. To help accommodate impacted snowmobile establishments,

I recommend that the NPS chooses Alternative 1b and phases out snowmobile use

according to its more protracted schedule.

6/6/02

<sup>1</sup> FEIS Record of Decision p. 11. Available at <http://www.winteruseplanning.net>.

<sup>2</sup> Leopold, A.S., Cain, S.A., Coitum, C.M., Gabrielson, L.N., Kimball, T.L. Submitted to: the Honorable Stewart Udall, Secretary of the Interior. *Report on Wildlife Management in National Parks*. March 4, 1963.

<sup>3</sup> SEIS Chapter I: Purpose and the Need for Action, p. 8-12. Available at <http://www.winteruseplanning.net>.

<sup>4</sup> SEIS Chapter III: Affected Environment p. 125. Available at <http://www.winteruseplanning.net>.

<sup>5</sup> Creel, S., J.E. Fox, A. Hardy, J. Sands, B. Garrott, and R.O. Peterson. In Press. Snowmobile activity and glucocorticoid stress responses in wolves and elk. *Conservation Biology*.

<sup>6</sup> Creel, S., J.E. Fox, A. Hardy, J. Sands, B. Garrott, and R.O. Peterson. In Press. Snowmobile activity and glucocorticoid stress responses in wolves and elk. *Conservation Biology*.

<sup>7</sup> SEIS Chapter III: Affected Environment p. 125. Available at <http://www.winteruseplanning.net>.

<sup>8</sup> FEIS ROD p. 19. Available at <http://www.winteruseplanning.net>.

<sup>9</sup> SEIS Chapter III: Affected Environment p. 125. Available at <http://www.winteruseplanning.net>.

<sup>10</sup> SEIS Chapter III: Affected Environment p. 105. Available at <http://www.winteruseplanning.net>.



mtaber@wyellowstone.  
com (Mary Taber)  
05/29/2002 09:47 PM  
EST

To: grte\_winter\_use\_seis@nps.gov  
cc: grte\_winter\_regs@nps.gov  
Subject: Restore Yellowstone in Winter

I am writing in response to the public comment period for the Draft Supplemental Environmental Impact Statement for the Yellowstone/Grand Teton Winter Use Plan. I have lived and worked in the greater Yellowstone area since 1980.

I am concerned that each of the four alternatives presented in the document proposes opening Yellowstone National Park to winter use during the month of November, a significant departure from current practice, in which the park is scheduled to open in mid-December.

In reading through the document, I was unable to locate any further reference to this component of the alternatives. There is no information on what this change in opening dates is in response to, nor any analysis of impacts to local economies or natural resources. Basically, this change in opening date constitutes a significant departure from the present practice, undoubtedly has impacts, and is not sufficiently analyzed in the document.

The following information and data are not included in the SEIS document and are necessary to adequately analyze the impacts of this increase in winter season length:

1) Was there any information received during scoping or public comments periods indicating that there is a socioeconomic demand for access to the park from mid-November to mid-December?

2) What is the anticipated visitor use level for this period?

3) Will this estimated visitor use be adequate to provide any economic benefit to gateway communities and the park concessioners? A marketing survey would be required to determine whether local businesses would be willing to provide visitor services during this time period, when many businesses are closed due to lack of visitors at this time of year, and whether the anticipated numbers of visitors constitute an economically viable and attractive business opportunity. What is the impact on current concession contracts in the park? Would the present concessioners be required to provide fuel, food services and lodging during this time period? Or will visitors be expected to provide for themselves in the park until concession operations open in December?

4) What will be the cost-per-visitor to the NPS during this time period, based on minimum required services provided by the NPS and the anticipated number of visitors?

5) What are the impacts of an increase in visitor season length on bison, elk and wolves? In particular, how will this affect the migration of bison to areas outside the park?

6) Will having tracked vehicles on the road during the time that park employees are driving their personal wheeled vehicles on the same roads result in any conflicts?

As a 20+ year resident of this area, I know firsthand that the Big Sky area has been unable to attract an economically significant number of visitors to the area in this pre-holiday time period. My concern is that Yellowstone National Park will increase the length of its winter season, causing impacts

to its natural resources and stretching an already too-thin budget over a longer period of time for a minimal number of visitors, resulting in an even greater cost per visitor than we already experience in the winter season. Meanwhile, local businesses will not realize any economic benefit, and may decline to even open their doors during this non-traditional tourism season. It appears that we are throwing a bone to a dog that doesn't even exist.

The EIS process is required in order to analyze potential impacts caused by changes in management policies affecting publicly owned lands. This increase in the length of the winter season constitutes a change in policy which may cause future impacts. I believe that my comments are substantive and raise issues that should be addressed in the final SEIS. I am requesting a personal response to my comments and concerns, either by e mail or by postal letter to the address below.

Sincerely,

Mary Taber  
Box 493  
Yellowstone NP, WY 82190  
(307) 242-7523  
Mary Taber  
Box 493  
Yellowstone NP, WY 82190  
mtaber@yellowstone.com



Arthur D Unger  
afulnger@juno.com  
02/20/2002 10:45 PM  
PST

To: grt\_winter\_use\_seis@nps.gov  
cc:  
Subject: duplicat mailing

I got 3 post cards. All said "AUTO\*\*ALL FOR AADC 90198"  
DIFFERENT numbers in address

7843 23 36                      7845 23 37                      7842 23 36

Arthur Unger  
2815 La Cresta Drive  
Bakersfield, CA 93305-1719

Further comments:  
I did see a newspaper article saying saying rangers at the gate had to wear air filtering masks. I do not think medical authorities think the masks protect well against VOC or small particles. The PSEIS should be prepared by physicians (Adrian Pope of the Brigham Young University in Provo, Utah?) that can refer to lots of related medical literature including:

the Harvard "Six Cities" study (New England Journal of Medicine, vol 329, p 1753)

Small particles enter blood stream (the January 29th 2002 issue of Circulation: Journal of the American Heart Association)

Thanks, Arthur Unger

**Michael J. Yochim**

815 Prospect Place #A  
Madison, WI 53703;  
mjyochim@students.wisc.edu  
608-257-7509

April 14, 2002

Planning Office, Grand Teton National Park, P.O. Box 352, Moose, WY 83012

Dear Sir or Madam:

It is with great displeasure that I write, once again, to express my views on continued snowmobile use in Yellowstone and Grand Teton National Parks.

I can hardly believe that the elaborate planning that went into the Winter Use EIS of 2000 was so simply discarded by the Bush Administration. It is an insult to the thousands of Americans that took time out of their busy schedules to provide input on the first EIS to simply toss that aside and request yet more comment! Those of you on the NPS staff in both parks must feel likewise.

Following are my comments specifically regarding the Supplemental EIS, or SEIS.

First, I wrote my master's thesis on snowmobile policy development in Yellowstone, and note that you have included one of my publications in your bibliography. The *Annals of Wyoming* has published two more detailed accounts of historic and recent snowmobile policy development in Yellowstone, both based on my thesis. You may want to include these in your bibliography for readers who may want to know more about this always fascinating, but sometimes depressing story: "The Recent Winter Use History of Yellowstone National Park: How Should the National Park Service Envision Its Dual Mission?" *Annals of Wyoming* 73(1): 33-46, 2001; and "Snowplanes, Snowcoaches and Snowmobiles: The Decision to Allow Snowmobiles into Yellowstone National Park," *Annals of Wyoming* 70(3): 6-23, Summer 1998, both by Michael J. Yochim.

In general, I commend the Grand Teton and Yellowstone staff for gritting your teeth and performing yet another excellent planning document.

Although I still think it would be better to plow Yellowstone's west-side roads and open them to wheeled, public-transit, guide-driven vehicles, I realize that is probably not feasible at the current time, so I therefore fully support the snowmobile ban as articulated in the first EIS, and as discussed under option 1a in the SEIS.

The three core issues of snowmobile noise, pollution, and impacts on wildlife are themselves adequate reasons to ban the obnoxious machines from the park. I have spent parts of several winters in Yellowstone, and have yet to find a place WITHIN 10 MILES of a groomed road that is completely free of snowmobile noise. Snowmobiles create ghastly amounts of air pollution, leading Yellowstone to be one of the few, if not

the only, national parks that violate the Clean Air Act *due to pollution generated within the park*. And even though science cannot prove snowmobiles negatively impact park wildlife, many a winter visitor has witnessed conflicts between snowmobiles and wildlife—conflicts that are almost never settled in favor of the animal(s). I realize this is not new information, but I do wish to suggest that even though science cannot prove a deleterious impact on wildlife, the conflict between the snowmobile as machine (more accurately, a bastardization of technology) and the bison as nature, is so apparent. In a city, we expect the machine to dominate. It should not do so in a national park.

The National Park Service has a long history of managing its parks in line with its traditions, and with science. While science increasingly dominates park decision-making, tradition continues to offer a powerful reason for decisions. Scholars have written extensively about tradition's role in park management. Yellowstone's own Paul Schullery argues that science and tradition should be used as twin referents in managing the park, a claim that Thomas and Geraldine Vale echo in their book on Yosemite (*Walking with Muir through Yosemite*, (Madison, University of Wisconsin Press, 1998). James Pritchard, Judy Meyer, Ronald Foresta, Michael Frome, and Dilsaver and Tweed all make similar arguments in their respective books. These are the scholars of National Park history and ideas; they all claim that tradition is and should continue to be part of managing national parks.

Yet, Yellowstone park managers seem hesitant to draw upon tradition as a reason to ban snowmobiles, even though they so obviously conflict with the contemplative idea behind national parks. Put simply, national parks do not exist to be snowmobile racetracks, which West Yellowstone has effectively turned Yellowstone into. Rather, they exist as places to observe and contemplate nature; to reflect upon the role of humans within nature; to contact and feel natural power, rhythms, and purpose. Snowmobiles will never foster these ideals. They foster aggression, competition, and challenge. They conflict with national park tradition, and should therefore be banned.

More specifically, the NPS Organic Act mandates the NPS "to conserve the scenery and natural and historic objects and wild life therein and to provide for the enjoyment of the same in such manner and by such means as to leave them unimpaired for the enjoyment of future generations." Permitting snowmobile use does NOT conserve the scenery and natural objects and wildlife of the park. Snowmobiles cloud the air, disrupt the natural quiet, and conflict with park wildlife. Clearly, snowmobiles conflict with the primary law guiding national park tradition.

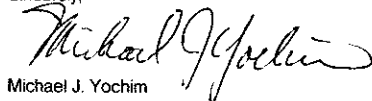
Snowmobiles also conflict with the egalitarian, democratic ideals embodied within the national park idea. Frederick Law Olmsted argued that national parks should be places open to people of all classes, of all walks of life. Over their history, national parks have become increasingly the pleasuring grounds of all Americans, less and less the resorts of the rich. Yet, only the wealthy can afford to rent snowmobiles, or to stay overnight at Old Faithful Snowlodge. I can't even come close to affording a room

in that pricey place. I am fortunate to have friends to stay with at Old Faithful, but how many Americans are so lucky? Indeed, I've had a number of friends visit me when I lived in Gardiner wishing to visit Old Faithful, only to be turned away by the cost. If the NPS restricts winter traffic to *four-cycle snowmobiles*, the park will become even more the exclusive enclave of the rich, because four-cycle snowmobiles cost much more than two-cycle machines. This is just another reason snowmobiles in all forms must go.

I've been watching this story now for close to ten years, and researching it for both my graduate degrees. I am sorry to say that I am increasingly convinced that the National Park Service does not have control of its own Yellowstone Park. I'm not even sure Congress does. Increasingly, I believe that Clyde Seely, Glenn Loomis, Randy Roberson, and Bill Howell do. They have built a snowmobile plutocracy in West Yellowstone, and have become fat and wealthy on their rentals, motels, and other businesses. They will do almost anything to keep it that way, even if it means exploiting the world's first national park and ruining the experience of most visitors. Unfortunately, I think they are the ones with true control over Yellowstone in winter. Glenn Loomis himself—one of those with power and money—said it best: "This fight about snowmobiles in Yellowstone Park is not about protecting the park; it's about power, money and who controls access, plain and simple" (as quoted in *High Country News*, April 1, 2002, page 1). Until we can control the plutocracy, true reform in Yellowstone—tradition and all—is doubtful at best.

Thanks for considering my input, and good luck in your efforts to preserve a semblance of winter grandeur. I'll bring my earplugs and respirator for my next visit.

Sincerely,

  
Michael J. Yochim



Tim Young  
<tyoung@wyoming.com>  
05/29/2002 07:18 AM  
CST

To: <grte\_winter\_use\_seis@nps.gov>  
Cc:  
Subject: Winter Use Plan Comment

May 28, 2002

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
PO Box 352  
Moose WY 83012

Sent via email

Subject: Winter Use Plan Supplemental Environmental Impact Statement

Dear National Park Service,

I am writing to submit my comments on the Draft Supplemental Winter Use Plan Environmental Impact Statement for Grand Teton and Yellowstone National Parks and John D. Rockefeller Jr. Memorial Parkway.

I note that the "fundamental purpose and need for action in the supplemental analysis remains the same as in the FEIS...[and] the nature of the decision to be made remains essentially the same as described in the FEIS". The Purpose and Need for Action (page 5, Summary) include the following desired conditions:

- Visitors have a range of appropriate winter recreation opportunities from primitive to developed.
- Recreational experiences are offered in an appropriate setting
- High quality facilities are provided in parks to support the need for safety and enhanced visitor experiences.

My main comment is that to create these desired conditions, non-motorized visitors experience needs must be addressed in the decision. Ungroomed trails will only meet a portion of the desirable range of opportunities, therefore the decision will need to include some appropriate non-motorized use groomed trails in Grand Teton National Park to provide the desirable "range of opportunities", and "high quality...enhanced visitor experiences".

Appropriate new groomed non-motorized trail should be created in GTNP for several reasons that help meet the purpose and need. The DEIS page 151 notes a survey of Cross Country skiers, (Parrish et al. 1995) that over half of visitors, 52%, preferred to ski on groomed trails. While currently, YNP

maintains 37 miles of groomed non-motorized trails (DEIS), GTNP has zero, yet has the opportunity to provide excellent opportunities in locations that have no significant natural resource impacts. Groomed Non-motorized Trails "...creates predictable patterns of winter use and confines resource impacts to narrow corridors" as stated in the DEIS. There are also positive benefits to visitor health, and it is a visitor use that is low impact, silent, with no visitor created pollution. Cross country skiing, winter walking and snowshoeing on groomed trails are relatively low cost modes that are more accessible to a range of visitors with disabilities, minorities and low income populations.

Therefore, I recommend that non-motorized groomed winter nordic skiing trails be included in the decision for two corridors in GTNP, and the park should invest in providing quality facilities for non-motorized visitors who desire an accessible groomed trail experience.

1. The corridor from the south-west park boundary near Teton Village to the Moose Visitor Center. This takes advantage of the existing visitor services, transit, and parking located outside the park in Teton Village, and gives park visitors excellent opportunities to enjoy the park without having to drive great distances.
2. The corridor between Moose and Jenny Lake, also taking advantage of existing and planned visitor services in Moose.

These two non-motorized use winter groomed trails, in addition to ungroomed opportunities, would better meet the purpose and need for action. It is also likely that if new winter visitor activity centers such as Colter Bay are included in decisions, these will also need to provide short groomed trails that are accessible to visitors from the door of the activity center.

Other comments: Given the SEIS statements of Purpose and Need for Action and Desired Condition, I believe it is essential to include a non-motorized representative on any proposed advisory committee makeup. I also support plowing the road from Mailbox corner to the FS trailhead for Shadow Mountain. This is needed to provide ski access to Shadow Mountain.

I agree that winter activities are an integral part of the visitor experience in the GYA, and that more specific policies and management direction are needed to guide winter use in the parks and protect sensitive resources. I further agree there is a difference between the desired conditions, and the existing conditions, thus the need to develop a plan. I thank you for your consideration of my comments.

Sincerely,  
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5/19/02

Winter Use Draft SEIS Comments  
Grand Teton and Yellowstone National Parks  
P.O. Box 352  
Moose, Wyoming 83012-0352

Dear Park Service,

This letter is in regard to the snowmobile situation at Yellowstone National Park. We have been leading winter backcountry ski trips to the Park for the past 15 years. Trips are made up of 15-20 participants, including ourselves, and are sponsored by the Appalachian Mountain Club (A.M.C.). This letter represents our opinion; it is not the official position of the A.M.C.; we do not know if the club has an official stance on this matter. Our best guess is that many of the club's members would probably share much of our opinion.

Over the years we have observed that snowmobile traffic has grown enormously. This growth has produced a major environmental hazard. In turn, this hazard has had the effect of compromising the integrity and purpose of the Park. There is significant air pollution, noise pollution, possible disruptive effects on wildlife, and a lessening in the quality of the outdoor experience for non-motorized recreationists.

Here are some particulars to our observations:

- 1). Air Pollution.  
There are several places in the Park having heavy snowmobile traffic, e.g. Old Faithful/Snow Lodge, West Yellowstone, Canyon warming hut. Further, some spots on the roads tend to 'collect' large numbers of riders passing through, e.g. the approach to Bisquit Basin, parts of the road to Madison Junction, and others. There is a haze from incomplete combustion of fuel - a common problem with two-stroke motors. The smell is obnoxious and is completely at odds with what many expect in a National Park. Toxic air is obviously incompatible with health.
- 2). Noise Pollution.  
The roar of hundreds of snow machines is contrary to the expectations of an outdoor/wilderness experience. This occurs routinely at places like Old Faithful. One of the outstanding ski tours in the Park - indeed, in the country - is that of the Mallard Creek tour. I have led this tour on each of our 15 trips. For miles one can leave the belching stench and raucous noise behind. Then, about 4 miles from the end of the remote part of the trail, one can hear again the distant gnat-like noise of machines. At 3 miles

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the noise is less gnat and more of a distant roar. At closer distances you can forget any resemblance to a wilderness experience. The trail ends in the basin area, and continues parallel to the road for a fair distance; one is accompanied by the sounds and sights of machines almost everywhere. The issue is not to re-locate the trail; the issue is it should not be necessary to re-locate anything in the first place.

3). Accidents.

We have witnessed several accidents over the years, e.g. 1995 - a rider tips over going over the low end of an embankment; 1999 - a rider runs into another machine; 2000 - a rider tips over and hits the front end of an AMFAC snow coach. These were likely inexperienced riders of rented machines. A 30 minute 'quickie' lesson is worse than worthless; it leaves an absolutely inexperienced rider with the false impression that they can handle a powerful snow machine. They ride off, thinking 'this is a snap'. No - it isn't. Our guess is that there are fewer problems of this sort with rides organized by established clubs. However, we have also seen other problems posed by herds of club riders, including noise, congestion, traffic bottlenecks involving bison, etc. And, of course, speeding. Unfortunately, machines whizzing by at very high rates of speed have not been isolated occurrences. We have seen them repeatedly. Given the purposes of a National Park, it is nothing short of astounding that the dreadful list above refers to 'stuff' that has occurred within Yellowstone.

4). Effects on Wildlife.

We have seen, each year that we have been in Yellowstone leading the trip, a number of incidents in which snowmobile riders come too close to bison. Accidents have been documented as have serious injuries to riders and animals. What is the effect of noise and air pollution on wildlife - not only bison, but effects on coyote, elk, and other species. It should not be necessary to remind those with decision-making authority that the absence of effects is not evidence for their absence. Further, it should not even be necessary to study this effect. Why? Because such study - given the purposes of the park as a sanctuary from 'civilization's' intrusions - should not be required in the first place.

5). Road Quality.

Due to heavy snowmobile traffic, the road quality, by mid-season, is quite poor, requiring repeated grading. This is costly. Would it not be a better use of scarce park funds to have them go in the direction of such use as: more snow rangers, update of rescue equipment, upgrade of existing educational signage, more interactive and computer driven displays at visitor centers, and such like. Phasing out of snowmobiles in Yellowstone would quickly achieve the goal of reducing road maintenance costs.

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6). Alternatives.

There are lots of places to run snowmobiles, other than in the premier park of America's National Park System. There's private land. There's Bureau of Land Management land. There's portions - large portions at that - of National Forest land. Snow machines are recreational vehicles; rights and privileges ought not to be confused. Within the borders of a National Park rights should be determined within the context of the purposes of the park. Anything else is a privilege, to be regulated as usual, including licensure, permissible access, etc.

We hope it is apparent that this letter is meant to be constructive. It is, in fact, a kind of love letter for the Park. It is sent with the hope that the Park Service - the working stewards - do the right thing.

A final point. Am I anti-snowmobile? No. I happen to own a machine. I use it primarily to groom my ski trails, but there are also times when I enjoy just riding around on it. I have also been involved with snowmobile clubs. One can find uses for such machines, but their use should not undermine the purposes of a National Park.

The Park Service has heard several times - four, if memory serves - that the use of the snowmobile should be phased out. Further study is unnecessary, and is suggested by the industry and current administration in Washington as delay tactics. We trust the stewards of the Park will resist this pressure. We want you not to allow this jewel of a Park to become tarnished by an emphasis on further motorization.

Sincerely,

Roger S. Zimmerman

Lynne Zimmerman